IN THE CIRCUIT COURT OF THE STATE OF OREGON

FOR THE COUNTY OF MULTNOMAH

JULIE CHRISTOFFERSON TITCHBOURNE,)
)
Plaintiff,)
)
vs.) No. A7704-05184
)
CHURCH OF SCIENTOLOGY, MISSION)
OF DAVIS, a non-profit California)
corporation, doing business in)
Oregon; CHURCH OF SCIENTOLOGY)
OF CALIFORNIA, a California)
corporation, doing business in)
Oregon; and L. RON HUBBARD,)
)
Defendants.)

EXCERPT OF PROCEEDINGS

Volume XI
Pages 5109 to 5204 and 5250 to 5306
Testimony of Gerald D. Armstrong

April 16, 1985

BILL ELLIS & ASSOCIATES
Court Reporters
1001 S.W. Fifth Ave.
Portland, Oregon

(Court reconvened 4/16/85 at
9:42 a.m.)

THE COURT: Ready, gentlemen?

MR. MANION: Yes, Your Honor.

MR. WADE: Yes, Your Honor.

THE COURT: Okay. Bring the jury back.

(Following proceedings held in the
presence of the jury.)

THE COURT: Good morning. All right. Why don't we catch the lights and we will go back to where we ended the tape.

(Continuation of the playing of
videotape.)

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MR. Armstrong: ...to attack and discredit and intimidate and harass this one individual, that's the kind of stuff. And what's happened in the organization? You know, do you know anything about the use of PC folders?

I was called by -- I guess it was Joey -- before I went to UK at the end of June, something about -- you know, my PC folders were being moved somewhere and there's a possibility of getting them. Someone in your group who knew about it, someone knew that the PC folders were being moved around.

Someone has been involved in the last two years going through PC folders. Right?

MR. RINDER: Why?

MR. ARMSTRONG: Have they? Why were my PC folders moved?

MR. RINDER: I don't know why they were moved.

MR. ARMSTRONG: Where were they coming from?

MR. RINDER: They were coming from the CW.

MR. ARMSTRONG: What were they doing in CW? I was never at CW.

MR. RINDER: I don't know.

MR. ARMSTRONG: Where Were they going to?

MR. RINDER: That's real circumstantial stuff.

MR. ARMSTRONG: You get the idea. What if someone has been -- Was someone held? Has anyone been held in the Organization? What's the situation in there? Do they have guys who frisk people when they come in and out? It doesn't happen? So you can get whatever out you want?

MR. RINDER: Yeah, I can get out anything I want. (Inaudible)

MR. ARMSTRONG: I don't know. In any case they went through a very elaborate, very elaborate way of keeping things for the bottom of the fucking trash cans sitting out there --

MR. RINDER: They were more into that sort of shit than I am. I mean, I can walk in and out with stuff. You know, what is it that I walk in -- you know, I don't totally follow where that -- where that leads.

MR. ARMSTRONG: Where it leads is simply, number one, what's the atmosphere inside. You know, in a complaint, you are going to have to state the facts as you know them. I don't know, maybe there are no facts. Maybe it never happened and maybe Ingram doesn't even work for the organization. I mean the fucker threatened to put a bullet between my eyes.

MR. RINDER: Are you kidding me?

MR. ARMSTRONG: Did you guys get the tape? I -- as I understand it, the tape -- I don't know. I think I'm probably being set up. This thing here is hotter than a pistol. Anything I send you guys --

MR. RINDER: You mean this draft?

MR. ARMSTRONG: (Inaudible) of whatever I sent in to --

MR. RINDER: I'm the only one.

MR. ARMSTRONG: You are the only one? That's not what I sent in.

MR. RINDER: Which? This?

MR. ARMSTRONG: Yeah.

MR. RINDER: This is the copy. The other one's stored.

MR. ARMSTRONG: how about the one that the girl had?

MR. RINDER: You got it back.

MR. ARMSTRONG: So there is at least two?

MR. RINDER: Yeah. I know exactly where they are at. There are two copies and I know exactly where they are at. It's not like I left them with complete ignoramuses.

MR. ARMSTRONG: Not at all. In fact, you know, I'm in a more vulnerable position, because I can be -- you know, I'm so visible. What if I dropped out of sight?

MR. RINDER: We'd need you.

MR. ARMSTRONG: Not necessarily.

MR. RINDER: We could set it up so that if you just dropped out of sight --

MR. ARMSTRONG: That's beneficial. Maybe you can drive the organization --

MR. RINDER: What?

MR. ARMSTRONG: I don't know. Do you have some old intelligence personnel in there?

MR. RINDER: Yeah.

MR. ARMSTRONG: Guys who think this stuff? That's the problem that I see, is, you know, the intelligence possibilities are enormous because the organization is an intelligence operation, so it's vulnerable. It exists on secrecy and the need to know, so it's vulnerable along those lines. An open society is not nearly as vulnerable. What if they find out -- You know, there is no real down side with me. But they're vulnerable, and we are not as vulnerable as they are. You know, they are bigger because they have all the bucks. But I don't see that that's any problem in the long run. (Inaudible)

MR. RINDER: That's very true. That's very true. I mean, that's one of the things that we have got to try and preclude because, if we get into that position, they don't want to spend all of the fucking money to handle fucking lawsuits.

MR. ARMSTRONG: That's right. That's not Scientology.

MR. RINDER: Right, it isn't. You are right. That money --

MR. ARMSTRONG: It shouldn't be spending its money on that; it should do something decent in the world. Something decent can come out of it, not just a lot fat folders and sec checks and broken families. That's crazy. So --

MR. RINDER: So what if you dropped out of sight? I didn't totally follow the progression there. What advantage would that be?

MR. ARMSTRONG: It could possibly be a great deal of advantage. But --

MR. RINDER: I'm not following that. I'm not -- You mean we could maintain a comm line with you even though you were not as visible to everybody else in the organization?

MR. ARMSTRONG: When someone drops out, it really excites people. You know what I mean?

MR. RINDER: Like Terri Gamboa and Gerry Armstrong --

MR. ARMSTRONG: If that were to happen, then --

MR. RINDER: Don't you think that would just attract more attention to you and make it more difficult for us?

MR. ARMSTRONG: I don't -- I don't see why, necessarily.

MR. RINDER: Okay. So what do you see in

that?

MR. ARMSTRONG: I don't know everything that can be developed, but possibly I see -- I see the possibility of removal of the PIs. Say they remove the PIs, they've got to set up their own internal information apparatus again.

MR. RINDER: Uh-huh.

MR. ARMSTRONG: Right now, you guys -- it's all done by the PIs. Who has the PI reports?

MR. RINDER: They go to -- They go to OSA Int.

MR. ARMSTRONG: Where is that?

MR. RINDER: You mean what building? It's about the same as Pac.

MR. ARMSTRONG: Who's in it?

MR. RINDER: ASHO Int?

MR. ARMSTRONG: (Witness nodded head.)

MR. RINDER: I don't know. Possibly --

MR. ARMSTRONG: Are they in a position where they can find out what's going on?

MR. RINDER: Not necessarily everything, but they -- there is definite lines.

MR. ARMSTRONG: Are they in a position where they can -- they can get current strategy? Are they in a position where they can get PI reports? Can they find out who are the operating PIs currently?

MR. RINDER: Probably.

MR. ARMSTRONG: Because what if the operating PIs -- what if someone can do some leg work on finding out who the fuck they are and find out what the fuck they have done. Ingram is a rather unsavory character. If you were to put together that in itself, if you were to put together, you know, a sheet on these people -- let's say you come up with some criminal past. Let's say you come up with some real sleezy dealings, that in itself is commended PR leverage.

MR. RINDER: Why?

MR. ARMSTRONG: Maybe you can't necessarily do all those things. Maybe CID can run a make on them. CID asked for -- you know, who took photographs and gave me a license number. I got a partial license number, but I couldn't get the whole thing. 1DD, or DD something. A couple of D's in there.

MR. RINDER: Right.

MR. ARMSTRONG: I would like to -- I mean they can do it. They will run checks.

MR. RINDER: On what basis will they do that sort of shit?

MR. ARMSTRONG: Well, anyone who talks to them is a witness.

MR. RINDER: You know -- How are you going to call the fucking CID and say, "Can you run a make on this car?"

MR. ARMSTRONG: I want to know because I'm a witness. If I can get the guy, we can have his ass down there. I'll subpoena the guy. That's the kind of liaison where, you know, we can actually -- you know, cause a lot of things to happen if there is this kind of detailed information going back and forth. You know, if I know the name of the guy, we can issue a subpoena for him, find out what the fuck he was doing there, on what basis he was photographing me. You know, that's the kind of stuff. And you will back the fuckers off.

MR. RINDER: Do you feel like it would be best for you to drop out of sight to pull that sort of stuff off?

MR. ARMSTRONG: Not necessarily. I'd just see that -- I know that that excites the organization when you can't find somebody.

MR. RINDER: We don't want to excite them. I'm a little lost on that as to why we would want to excite them about you. I mean, if you are our comm line --

MR. ARMSTRONG: If you don't -- you don't have anyone else whose life you are potentially in control of around here, you know, in a position such as myself, someone wwho -- someone who could excite them. I mean I have excited them; right?

MR. RINDER: Right.

MR. ARMSTRONG: There's been times when it was get-Armstrong week; right? The same thing could happen again. And maybe this time when it happens they can be set up. Maybe you can get what you need.

MR. RINDER: And do something?

MR. ARMSTRONG: Yeah, I can do something. I don't know the form it can take, but I know that if you got some intelligence personnel in there and you give them the idea, I mean there is a lot of things that can develop. You know. With our existing communications line, it's such a unique situation, that it can be developed into anything you want. I think that we should be a lot more secure than we have been, because I do not believe for a second that -- you know, that the PIs do not tap phones.

MR. RINDER: Right.

MR. ARMSTRONG: I think that they they do.

And I also think that the PIs are not necessarily telling the organization what the fuck is going on.

MR. RINDER: You think they might be, like scared of leaks?

MR.ARMSTRONG: Well, they are possibly scared of leaks, sure, because they don't want to -- If you were being paid what they're being paid, wouldn't you want to maintain this thing? If you look at whose got a vested interest in the lawsuits continuing, it's the attorneys and the PIs. You got people on the top, too, because that's how you keep troops in line. You gotta have enemies, and they know it and they play it. But the attorneys, you know, who recommend that they file more lawsuits and more lawsuits, they are crazy. They're just prolonging it, because no one --

Look at the stats. In the last two years has anyone -- three years has anyone backed off from the organization? Have they had any wins? They probably count them as wins, but give me a break. Also there's more documents out right now. There is more people willing to talk. They went after Mayo, and what did those fuckers do? Ended up talking to the Feds. You know, whoever in their wisdom is running this thing is doing a fucking botched job, which is another reason why, you know, you guys would be smart to move in, because, you can't keep driving away the parishioners forever and end up with any money.

MR. RINDER: Right.

MR. ARMSTRONG: You know. And I'm involved in this because, you know, in a sense it's where I live. In another sense, you see, I'm very altered at getting out of the organization, because I don't give a fuck anymore. I don't have the thing about life and death that I used to have. In fact, I would rather welcome a bullet. In a sense it puts me in a rather powerful position. Not that I'm looking for it, not that I really contemplate doing it myself, but I don't care. I mean if you guys can view the fact that I don't care, and the fact that I'm right, and the fact that I disappear, and other facts which you can use --

I mean I envisioned it at the outset that potentially you guys could develop an intelligence apparatus which the organization does not have currently simply by scooping the PIs. If you had some intelligence on Armstrong, you know, you could get a feather in your cap and possibly move up in that way to the point where you're let in on what the fuck's going on. Or someone -- you know what I mean? If suddenly you are the only guy who has -- you know, let's say someone in the organization that had the sense to retain a mole somewhere. Let's say that someone -- we could set it up so someone got close to me, then you've got your intelligence network. And then back the PIs off because you don't want them fucking up.

And suddenly you are getting funding to get them intelligence and you don't give a fuck if they did or not, but they get real excited about it. The people at the top get excited about little -- this happened and that happened. They start buzzing about it; right?

MR. RINDER: Uh-huh.

MR. ARMSTRONG: You should give them something to buzz about. I don't know the formula, because it's so unique. I don't know your capabilities or who you've got on the outside or, you know, the communication lines by which it could happen. We could set the whole goddamned thing up so that -- so that you've got someone from the organization in the same apartment complex that I live in, that I moved to. Do you know what I mean? Possibly in that way, you can have enough information so that it makes sense for your contacting the people at the top about it.

MR. RINDER: Right.

MR. RINDER: And becoming part of the plot simply because your the guy who's got it, and they're going to depend on you. You follow me?

MR. RINDER: Right. I'm following you.

MR. ARMSTRONG: There's a lot of possibilities. How they can be worked out, I don't know. But I know that -- I know that if we determine to say, "Okay, (inaudible) keep the lawsuit on the back burner, you know, attrition goes on as ever it goes on. And now let's -- let's see what else we can do."

I don't know what can be done between us. Obviously I can get you information as it becomes available to me, you know. And hopefully you can do the same for me. I mean that's a very valuable thing, just to know -- you know, who filed -- or who photographed me. That's valuable because it can be used, because you can get -- The organization can be nailed for intimidating witnesses. I'm a federal witness; you can't go around photographing me.

MR. RINDER: Right.

MR. ARMSTRONG: So some stupid fuckhead in the organization tries to be a hero. I would like to know who it was. You haven't heard anything about the manuscript?

Probably, my guess is that it will only go to the top, very top. But the fact that I'm writing a book, the organization can't stand people that write books. You know, it was done to people who have written books before. The same thing is true here. And the book is -- you know, they know that I've got data and they know that I can spring it together.

MR. RINDER: Right. Maybe -- Maybe it would be --

MR. ARMSTRONG: I don't know either. But I know that there are a lot of things that can be worked out. I would kind of hesitate to do them if -- you know, if we are going in different directions. I think that --

MR. RINDER: I don't think we are going in different directions.

MR.ARMSTRONG: I don't think so at all. I think both of us, you know, want to see the organization transformed into something decent.

MR. RINDER: Right.

MR. ARMSTRONG: That's what I want to see, because when it's something decent, I can deal with it, and everyone else can deal with it. You know, we can get on about life and, you know, whatever is valuable in life. It isn't valuable to me to continue to battle that organization. But I'll continue to do it. And I think that everyone else --

MR. RINDER: Why do you do that?

MR. ARMSTRONG: Do what?

MR. RINDER: Why are you continuing to battle with it?

MR. ARMSTRONG: Well, because it's natural. Philosophically I see that it has to be transformed. I mean --

MR. RINDER: Like you have a right to personal --

MR. ARMSTRONG: Do you think after fifteen years I can say, okay, I can walk away from that? Come on. I put as much into it as you did. I put my whole fucking life into that thing.

MR. RINDER: Right.

MR. ARMSTRONG: To say that I'm any less a Scientologist than anyone else is bullshit. But I have a higher commitment to the truth than I do to some label, which is at best is a symbol of a symbol of a symbol. At this point, it's becoming virtually meaningless to say what was a Scientologist is no longer a Scientologist.

MR. RINDER: Right. Yeah, I understand that. That's for real.

MR. ARMSTRONG: I don't have anything against Hubbard. Not a damned thing. I think that -- you know, I guess the ultimate thing about Hubbard is that he is exactly like us. Exactly. Not a fucking particle of difference. And he didn't rise above the bank.

Such things may be possible. In facts, since getting out of the organization, more has happened, you know, mentally than the whole time I was in it, to the point where, like I say, I'm radically altered. I was never like this inside. You never even heard from me inside.

MR. RINDER: I saw you screaming around the between decks every now and then.

MR. ARMSTRONG: Rarely. You know. That's a whole different thing.

MR. RINDER: So what do you think? Where are we -- Where do we go from here at this point? Like, we still gotta -- I mean I'm -- You said a number times that regardless of the lawsuit, regardless of the lawsuit, regardless of the lawsuit. This is still something that I am interested in proceeding with if we can get it into a framework where it's something that we can actually pull off. I'm not interested in it if we are just going to end up crucifying ourselves by bringing a suit. And I'm not, going to be stupid enough to do that. I --

MR. ARMSTRONG: I know. And again, I think that it has a tremendous possibility. It has tremendous possibility and it really doesn't matter about the outcome. It may to you, in some -- in some fashion right now. But you have to think that that cuts you off from Scientology or what you -- you know, what you consider important. God, it may even be a temporary setback. But that's the most it can be. You know, I think, fuck, grab the bull by the horns. Sue the fuckers. I mean, that's --

MR. RINDER: We've got to go into this thing with something that has good grounds.

MR. ARMSTRONG: Exactly. And that's why you guys have to come up with affidavits. And you should be sending --

MR. RINDER: That was the question that I asked.

MR. ARMSTRONG: Send me the fucking affidavits.

MR. RINDER: From who? From our guys?

MR. ARMSTRONG: Well, now we are talking. Your guys, yes. It would be real smart if your guys, who worked in the organization, whoever decides to do it, whoever says, "I'll take the fucking plunge." You know, Mike said that we've got seven or eight. He also said, you know, use three or four outside.

In other words, get an affidavit from Schomer, because Schomer can give you the money. He can say this amount of money was sent to the (inaudible) corporation. Schomer can say thirty million in a given period. That's big bucks. Okay? Schomer, Nelson, maybe someone else on the outside. I don't know who. I really don't know. And let's say you had a few guys on the inside, guys who decided, I'll take the plunge. And you don't have to throw all your eggs into that basket. And --

MR. RINDER: And what do we want on these affidavits from these guys? I mean, I'm still --

MR. ARMSTRONG: You want anything that is known about monies, the organization; number one, going to a profit corporation ASI; number two, control by ASI.

MR. RINDER: ASI. Control by ASI. Okay.

MR. ARMSTRONG: Control by ASI. Use of organization monies for whatever reason. You guys can come up with the reasons. Okay. The boat in Clearwater. These are the only things I know about in the last couple of years. The Clearwater deal. The frameup of Mike Flynn. Anything that you know about PIs to harass individuals. Anything you know about -- about -- you know, money being spent for what you would consider, anyone would consider noncharitable purposes -- you know, to destroy people. You know, the control -- Where is the control? I don't know.

MR. RINDER: I'm seeing what you are talking about. These guys have to have, like, personal knowledge of this shit or what? I mean -- From what I understand, when you write an affidavit, you have got to, like, find guys who have --

MR. ARMSTRONG: Do you have any personal knowledge?

MR. RINDER: Some. Some. But I'd --

MR. ARMSTRONG: What's wrong with Flynn?

MR. RINDER: I'd rather not. I'd rather not -- I mean, as soon as I -- as soon as I was to write an affidavit, then that is going to go somewhere with my name on it, wherever it goes, to our attorneys.

MR. ARMSTRONG: Don't even sign the fucking thing. I want some affidavits so that they can be -- so that you know -- What the fuck is this? What are the allegations? You know, because I'm -- I mean, I'm kind of getting from you, "Well, shit the organization is fine. It's not doing anything illegal." And I'm sitting here on the outside, knowing that they want me fucking dead, and that I was threatened by Eugene Ingram. He was going to put a bullet between my fucking eyes. I know that they are up to their eyebrows in it. They must have paid -- I mean -- how much in -- How much did they pay?

MR. RINDER: Do we have to find someone that has personal knowledge of that in order to get an affidavit of those things?

MR. ARMSTRONG: How much was paid to Ingram?

MR. RINDER: I don't know. I don't know that they did.

MR. ARMSTRONG: Who paid? Who paid Ingram?

MR. RINDER: I presume the attorneys paid him.

MR. ARMSTRONG: Yeah, but it comes from your money.

MR. RINDER: Right. So it would be how much is paid to the attorney; right? I mean that's what we want to know.

MR. ARMSTRONG: Who gets an accounting of what, you know -- Your Board members. Your fucking Board members. The guys on the Board can't find out? Those are the people that should be signing it -- should be doing it.

MR. RINDER: I'm not asking about whether they can find out, but whether they need to in order to be able to do this. Do you see what I'm saying?

MR. ARMSTRONG: They can allege it. They can allege it. They don't even have -- They can allege it.

MR. RINDER: So they don't have to, like -- They don't have to have the -- you know, documents sitting in front of them and --

MR. ARMSTRONG: You can say the organization destroyed the document. Your organization destroyed it. But you can simply say, you know, upwards of millions of dollars have been paid, and fucking attach the goddamned -- If you attach freedom and say that the whole thing is crock of shit, that -- fucking -- you know, a Court has to look at that seriously. You know, the fact that -- you know, how about -- how about -- Oh, mailing lists. Can you get mailing lists? Who -- Who got freedom? How much was paid for freedom? Who was it sent to? You know, how about these issues being put out on people? Who gets them? How much money is spent on that shit?

MR. RINDER: Is that all going along this same line of --

MR. ARMSTRONG: The fact that organized -- number one, there is -- you have to say there is a conflict, a disagreement about control of funds. Number two, we are requesting the assets be frozen immediately. And the reason is this, this, this and this. Organization that is supposedly a religious organization, is spending nonprofit funds to destroy someone's reputation. They are paying private investigators millions of dollars to destroy someone's reputation. Fabricated evidence. You can allege that.

I have a lot of faith in Mike Flynn. You know, I really don't know one way or the other whether or not that the Tamimi thing is bullshit. But I have also spoken to the U.S. -- Deputy U.S. Attorney in Boston, and everything I get from anyone is they are going on the basis that it's bullshit and will uncover it sooner or later. They are trying to extradite Tamimi right now.

MR. RINDER: That'll be a real PR coup.

MR. ARMSTRONG: And I'm saying, you guys can allege it. Also, I mentioned to Joey last time, I don't think anyone has to get in a frame of mind where if they don't file this thing two days following the indictments, like they have to take a big loss on it, I wouldn't -- you know, within your group, I would let them know that, you know, the timing is not that critical. It's more sensible that everything be well-done and well prepared and well thought out.

MR. RINDER: Right. I completely concur with that.

MR. ARMSTRONG: However, you know, I would not delay years.

MR. RINDER: As a matter of fact --

MR. ARMSTRONG: So -- Just so the boys inside don't take a big loss on, "Fuck, no, we didn't do it when the indictments happened." It can be done. And also I think something should happen in the next couple of months.

You guys should fucking get affidavits. You know, probably the boys -- some of them aren't writers; right? It's a real pain. I know. I have written -- There's all of these things. You see, it isn't just organizational. There is all the personal conflicts and all the egos that are all involved in the whole thing.

MR. RINDER: Right.

MR. ARMSTRONG: And the -- You know, but -- Get me what they can. Part of what I --

MR. RINDER: What do you want to do with it?

MR. ARMSTRONG: I want to fucking see what can be done. Otherwise --

MR. RINDER: You want to just sit down and go over it?

MR. ARMSTRONG: I want to go over it. I want to have them and I want to give them to an attorney. I want to talk to the girl, and I want to set up an office, and I want to set up a separate corporation. I want to set up a corporation which is -- which will act as, outside the organization, a clearing house for improving conditions inside, just the same way as OSA is currently requesting all these knowledge reports. Set up an office somewhere and, via the organization's own mailing list, get knowledge reports on the guys at the top, with the intention of -- there is so many things that can be done. And I want to set up with -- you know, with her, an office so that -- so that, you know, you guys -- you know, you don't all own typewriters. You don't type?

MR. RINDER: I don't know if there is too much problem getting access to typewriters.

MR.ARMSTRONG: I don't know.

MR. RINDER: Everybody doesn't have a

typewriter, that's true.

MR. ARMSTRONG: Exactly. And you can't be sitting at your desk typing up an affidavit.

MR. RINDER: That's very true.

MR. ARMSTRONG: You see? So you're going to need someone -- you know, you can give me a rough draft and, you know, we can rework it and send the damned thing back in and type the signature.

MR. RINDER: Good.

MR. ARMSTRONG: That's the kind of thing (inaudible). That's why I want to see her, because I told her, I would say -- initially I would say, "I think twenty thousand bucks to an attorney and we need to set up, you know, a clerical office somewhere." I can't continue to do it. My wife can't continue to do it, but I can do it if we have sum funding. I mean, I stay completely fucking broke during this shit.

MR. RINDER: I'm not making a million out of it.

MR. ARMSTRONG: No. Is there any information on what the guys at the top are paid? The boys in the ASI? What is the control?

MR. RINDER: ASI -- I mean I can find out what -- what the guys, CSI people are paid. ASI? I don't know. We can find that out from Homer.

MR. ARMSTRONG: That way it was back then. They were making a lot of money.

MR. RINDER: Well, I doubt that that's changed. We could get that from Homer. That's a line that could be used via you maybe to get that stuff from Homer.

MR. ARMSTRONG: Are organization funds being sent elsewhere? And you can say, "Well, it's all legitimate because those are the agreements." Who the fuck signed the agreements? Where are the agreements?

MR. RINDER: Right.

MR. ARMSTRONG: You know, if you are a Board member, are they just figureheads or just some jerk they pulled in and said, "Here, sign this whenever we bring them around"?

MR. RINDER: I don't know whether I would characterize them as jerks, but --

MR. ARMSTRONG: They are treated like jerks, I'm saying.

MR. RINDER: Everbody is a bit of a jerk that gets treated like jerks right now. You know what I mean.

MR. ARMSTRONG: Simply because the attorneys are running it.

MR. RINDER: Yeah. I mean --

MR. ARMSTRONG: (Inaudible) Hell, enough of this fucking bullshit, the organization being run by attorneys. That's bullshit.

MR. RINDER: Yeah.

MR. ARMSTRONG: Anyway, -- Anyway, organization funds are going elsewhere where they ought not to be. Let's just say that, you know, CSC can do something or that -- are the Board members knowledgeable enough of legal things to be able to find it? Where the fuck are the minutes kept? What are the agreements? Where is this -- Where is this -- Who represents CSC? Who keeps all this shit?

MR. RINDER: Right. I don't know that they need to be legally knowledgeable to be able to find out where that stuff is.

MR. ARMSTRONG: How do we get a copy of it?

MR. RINDER: Right.

MR. ARMSTRONG: Let's find out what the agreements are, let's find out who signed them and then let's go talk to who signed them and find out the circumstances under which they signed them. Where are the agreements?

MR. RINDER: Okay.

MR. ARMSTRONG: Do you know the way I see this is ultimately going? Probably the organization will end up suing all of its former attorneys who have given you guys fucked legal advice. Just fucked advise, because it's cost a lot of money, no return, and the organization's public relations stance is worse than it's ever been. All the PIs are brought on everyone, with all their wisdom, and are potentially a bunch of indictments and a lot of ill will. And that's malpractice any way you slice it.

MR. RINDER: Right.

MR. ARMSTRONG: And look at the possibility of finding out how many people -- how many Board members does it take to form a quorum, and the form of their resolutions and --

MR. RINDER: Whether they have to be at a meeting or someone can resolve something and pass it around for signature?

MR. ARMSTRONG: Sure. If you have Board members, do they ever have a meeting? That alone. What if he says, "Well, you know, we never have meetings and it's all bullshit and I just sign things"? You know, if it's all a facade, that alone --

MR. RINDER: Yeah, I've got it.

MR. ARMSTRONG: But If it isn't a facade, and the Board can actually do something, the Board members have a vote, then maybe one day during a Board meeting something can be said, that maybe we need some new attorneys. We ought to get an assessment. Or how about just a resolution drafted and signed by enought people so that it can happen. And then you're indemnified.

The fucking -- The fucking board decided to get some more attorneys. And then other people, you know, contact the attorneys, not necessarily the old ones who are all entrenched.

MR. RINDER: Uh-huh.

MR. ARMSTRONG: You know, independent attorneys. You can look at it like, you know, all our legal things -- Let's say that the agreement is that all legal matters are handled by CSI. Number one, that's probably illegal; number two, it sets CSC up to take the fall, then they don't have control of (inaudible) Right? You've got to find out who deals with the attorneys. Does the Board deal with the attorneys? Who does?

MR. RINDER: The Board doesn't deal with the attorneys.

MR. ARMSTRONG: Who does?

MR. RINDER: There's -- Well, for the most part there's -- you know what OSA is?

MR. ARMSTRONG: Yeah.

MR. RINDER: The guys in OSA deal with the attorneys.

MR. ARMSTRONG: OSA is -- Do they develop legal strategies?

MR. RINDER: Yeah.

MR. ARMSTRONG: Or do they get direction from above? I mean is CSC independent or is it not? It's not?

MR. RINDER: I don't know. It depends on which context that question is framed, you know.

MR. ARMSTRONG: In reality.

MR. RINDER: I don't think that you can really say that any of the Church is independent, any of the -- You know what I mean?

MR. ARMSTRONG: Right. Now they allege independence, of course, in terms -- like if I were to sue CSC or if I were to -- you know, they allege independence, that's the way they get arouond the various lawsuits. All that's a single corporation. Right?

MR. RINDER: I don't know, Gerry. I don't know the answer to that question. I presume that --

MR. ARMSTRONG: (Inaudible) a separate corporation?

MR. RINDER: From which?

MR. ARMSTRONG: (Inaudible.)

MR. RINDER: Yeah, as far as I know, that's run completely separate.

MR. ARMSTRONG: Do they operate separately or are they underneath -- are they subject to Sea Org personnel coming in and telling them what to do?

MR. RINDER: I presume they would be subject to that. You know, that would be the way that I would see -- sure, if some missionnaire walked in there, that that -- they'd sort of stand up and salute, you know.

MR. ARMSTRONG: That's because it's not independent. You know, missionnaires can't walk into the corner grocery store and say, "Listen you guys, give me ten percent of your take."

MR. RINDER: Isn't that ecclesiastic?

MR. ARMSTONG: Fuck. That's the differentiation. You guys got -- you guys are bought. You know, when I was in the Sea Org, we never even fucking had the word "ecclesiastic." That was a -- That is bullshit. That's been created in order to allow the organization or allow the group at the top to retain control. And people buy it.

It's like, you know -- We never even called it the Church when I was in. It's just all a kind of PR bullshit that people are buying, party line. And you need to make a very distinct differentiation between what's ecclesiastic, because then you are talking the tech, whatever the fucking tech is, and whatever the philosophy is. But when you are talking about -- well, I can go in and order you to do whatever I want, open up your books; right? -- and not only that, but I can go in an rip off whatever I want and I can send you to the RPF, it's hardly ecclesiastic.

MR. RINDER: Okay. Well, okay.

MR. ARMSTRONG: Yeah.

MR. RINDER: I mean, okay. That's a new view. You know what I mean? That's what I'm saying about that external -- that external look at things is something of great value, because it points out things that -- that have become so --

MR. ARMSTRONG: -- ingrained.

MR. RINDER: Yeah. -- that it's like you don't see them anymore. It's like, you know, the boys have been setting the trees all around here and, (inaudible). "Look at all these trees around here," I go, "Tree? What fucking trees are you talking about?"

Anyway, I'm a little concerned about getting in their way. You have already given me a lot of shit to talk over.

MR. ARMSTRONG: There are so many ideas, you know, it just -- it's endless. You see, I can't control it. I can't control your group.

MR. RINDER: I know you can't. And there's no way that we can put you in the position to control it, because I'm not going to sit here and say, "Oh, yeah, well, you know, we got this guy here and this guy there, and la da da da da, because that's a pointless breach of security, in my view. You know, why do that?

MR. ARMSTRONG: No. It does make sense for me. There are certain things that -- that are very helpful to know. I don't need to know who your people are, but there are certain times when I need to know, you know, can you get this information? Can you find this thing out? Do you have anyone in Clearwater?

MR. RINDER: We can get stuff from Clearwater.

MR. ARMSTRONG: Okay. Do you know where my PC folders are?

MR. RINDER: all of them?

MR. ARMSTRONG: No. Any of them.

MR. RINDER: Probably we could find out where those ones that were being shipped before.

MR. ARMSTONG: Do you know why they were being shipped?

MR. RINDER: No. I don't know why they were being shipped.

MR. ARMSTRONG: Do you know who ordered them shipped?

MR. RINDER: No.

MR. ARMSTRONG: Can you find those things out?

MR. RINDER: Possibly, yeah.

MR. ARMSTRONG: Make a note, you know, anything that people know about PC folders; anything that, you know, the missuse to which these things are put; any culling that has gone on; any information which has gone to PIs. Who deals with PIs? The OSA people?

MR. RINDER: Well, yeah. The way that the PI line works, as far -- well, you know, on the ones that I have any understanding about, it goes from OSA to the attorneys to the PIs.

MR. ARMSTRONG: Is Peterson the main guy?

MR. RINDER: Yeah, he's the main attorney.

MR. RINDER: He's such a dumb shit. He's just a political, you know. He just kind of maneuvers and sleezes his way along. He's a fucking shitty attorney. He really is very stupid.

MR. RINDER: I'll make sure we don't take that to him.

MR. ARMSTRONG: You've met him, eh?

MR. RINDER: Yeah. I've met him.

MR. ARMSTRONG: He's fucking dense. I don't know. I mean -- But he's a sleeze, you know, so he kind of stays in his little niche of power by sleezing and by not being the guy to take the falls on all the cases that they lose; right? He's the fucking guy.

MR. RINDER: He's still there.

MR. ARMSTRONG: He's a dumb shit, too.

MR. RINDER: Well, listen --

MR. ARMSTRONG: You know, lay that kind of information up. Who has firsthand knowledge of that?

MR. RINDER: Of which?

MR. ARMSTRONG: Of that use of the PIs; that that's the line. You know, money is paid to attorneys and that -- and they in turn deal with the PIs. What information is given to the attorneys? Has anyone got one instance of anything from anyone's PC folders being told to an attorney or a PI? Anything. Anything that you can think of that is just -- it's either corrupt or it's rotten or even borders on illegal. And illegal does not necessarily mean the commission of a crime. It just means money used for the wrong purpose.

MR. RINDER: That's like civil, as opposed to criminal criminal?

MR. ARMSTRONG: This isn't a civil matter.

MR. RINDER: Right.

MR. ARMSTRONG: You know, just to say that number one, the organization is in control of people who ought not to control it; number two, they grab power by "X" means -- however they grab the power; number three, the current Board of Directors are mere figureheads, you know; number four, you know, so much money has been paid to do such and such; number five, you know, money was paid to PIs, $250,000, to entrap people in Florida. You know, so much was paid to -- you know, you can just say millions of dollars is being paid to PIs to harass and frame the viewed enemies of the Organization. All those kinds of things that are not the way you want it to be. You know? What is the organization now?

And then, get damned affidavits written. I don't care if they can't even write, but just put down into as sensible a form as possible whatever information the people who you predict could potentially sign a complaint.

MR. RINDER: One of the guys that would actually be the plaintiffs to do those. The guys that have -- well, they're obviously going to be the same people.

MR. ARMSTRONG: Well, on the other hand there are other people on the outside.

MR. RINDER: Right.

MR. ARMSTONG: Homer Schomer; maybe Mayo, I don't know; John Nelson; perhaps other people, who have been the subject of harassment or who know of organization monies being used improperly.

MR. RINDER: Well, you may have to help us with those ones.

MR. ARMSTRONG: I will help. I want also to find out about -- about money and whether or not someone wants me to talk to attorneys.

MR. RINDER: Okay.

MR. ARMSTRONG: Get me phone numbers, pay phone numbers. I'll only call if it's absolutely desperate. Also you guys should set up a contingency, I think. Figure something out -- I will be the person if you want -- so that if someone is held inside, that they are able to know that there's some means of getting that information out.

Because you know, no one wants anyone to be hurt.

MR. RINDER: That's very true.

MR. ARMSTRONG: So figure out --

MR. RINDER: Very true.

MR. ARMSTRONG: So figure out some contingencies like that so that every twenty-four hours -- if there isn't a call every twenty-four hours, call the Feds.

MR. RINDER: Okay.

MR. ARMSTRONG: Something, you know. I don't know what form it will take, but I think we should be real smart -- It's freezing up here.

MR. RINDER: Me, too.

MR. ARMSTRONG: I think it would be real smart to develop it, you know in the park.

MR. RINDER: So -- I'm not going that direction.

MR. ARMSTRONG: That's fine.

MR. RINDER: What I want to do, I have quite a bit of shit to talk over here, go over with the other guys, and I will get in contact with you using the numbers that you already have for right now.

MR. ARMSTRONG: Call my place.

MR. RINDER: Give you -- You got those ones from Joey, right?

MR. ARMSTRONG: I got three.

MR. RINDER: I will give you one of those.

MR. ARMSTRONG: Good.

MR. RINDER: You can then -- I will go to that phone, you know, and I'll tell you half an hour or whatever. You can call me there, and then I'll set out and we'll meet somewhere else.

MR. ARMSTRONG: Good.

MR. RINDER: Then when I come next time I'll bring another list of numbers to you --

MR. AMRSTRONG: Okay.

MR. RINDER: -- and you can throw it away.

MR. ARMSTRONG: Okay. And some means so that if -- you know, if I want to --

MR. RINDER: We can set up -- I don't see there's any problem in setting it up so that you could call a number, like even -- even in Joey's area, just call that number and leave a message for him. Not you, but --

MR. ARMSTRONG: Right. I understand.

MR. RINDER: -- under a suitable guise. You know, your mother called and left a message and wants you to call her back or something. And he wouldn't even have to go to the phone or anything; he would just have the message passed to him like --

MR. ARMSTRONG: I don't know his name. But anyway --

MR. RINDER: That's fine. That's fine.

MR. ARMSTRONG: By the way, you are just some blond guy with a long, black beard; that's the only thing I remember.

MR. RINDER: Right. Well, I appreciate that.

MR. ARMSTRONG: Good. Good to see you again.

MR. RINDER: You, too. Bye-bye.

MR. ARMSTRONG: Bye.

(End of videotape on November 17, 1984.)

MR. WADE: We'll go to the November 30th tape now, Exhibit 898.

(Following is video tape of November 30th played to the jury.)

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MR. RINDER: How are you doing? I don't have much time either.

MR. ARMSTRONG: That's okay. Shoot. How are things going?

MR. RINDER: Pretty good. I have some questions to take back to the guys because we are, like, wanting to roll now.

MR. RINDER: Good. In moving on, the first thing I want to ask you, did you tell Samuels and (inaudible) about us?

MR. ARMSTRONG: No.

MR. RINDER: You didn't say anything to them about us? You mentioned to me last time you talked to him. We are concerned this is being -- you know, too many people.

MR. ARMSTRONG: I don't think there's of (inaudible) right now. (Inaudible) called me and said he heard that -- that I might know something about a takeover. And I said, "I know absolutely nothing." I said, "However, I think it behooves each of us on the outside to realize that there has to be a transition of some things, and that sooner or later there's going to be a shift and we all should be thinking how indeed that should be happening and what it should be like afterwards, and that each one of us should be creating that." So I said, "I have no specific knowledge, I have none whatsoever. However, something has to happen."

So I let them know that, yeah, they can always talk to me, and that -- (inaudible) particular positions outside the organization, obviously every I time talk to those guys, you know, there's an exchange of information. But they know nothing that I could be doing about you guys. They contacted me -- (inaudible). Not by me but -- you know, you guys can't keep the lid on very much longer.

MR. RINDER: (Inaudible.)

MR. ARMSTRONG: Her own sister told at least three maybe four, maybe more people.

MR. RINDER: Right.

MR. ARMSTRONG: Okay?

MR. RINDER: We know about that.

MR. ARMSTRONG: I don't know. It's obvious that -- that's the only leak that I know of, of any significance.

MR. RINDER: (Inaudible.)

MR. ARMSTRONG: (Inaudible) -- Joey contacted me to get information, and I said, "Listen, (inaudible) -- You know, I'm glad you contacted me because I consider you guys part of the network. And frankly, you both ought to be thinking, you know, status quo can't exist. What are we going to do? Everyone that I talked to led us along that direction. But as far as names, no one ever at any time will ever get a name out of me.

MR. RINDER: Right. Exactly.

MR. ARMSTRONG: You know, probably a lot of people know. Probably -- I would say that the Scientology world is so bored, and they're so (inaudible) and frightened of this (inaudible) shit anyway -- you know --

MR. RINDER: Yeah. But we just want to make sure that you are not passing around to anybody unnecessarily or doing anything that would damage our security.

MR. ARMSTRONG: In each case like Dave Jordan. Dave Jordan (inaudible) and that's fine. Dave Jordan heard a rumor that Dan might be a revelation to the organization.

MR. RINDER: Right.

MKR. ARMSTRONG: I went out and specifically didn't get in that thing. I let him know that, listen, Dan simply doesn't -- Dan doesn't have anything going with the organization.

MR. RINDER: Good. Okay.

MR. ARMSTRONG: And I let him know that every time he talked like that he put his life at risk because the organization has a lot of heavies working for them. No one --

MR. RINDER: That's exactly right. Okay that's fine. I just wanted to make sure.

MR. ARMSTRONG: I do what I can. I'm as sensible as I can. It's on my mind all the time, take it from there. By the way, no one will ever get any names, any communications, any times, any dates or anything out of me. That's just the way it is. I will to go prison before I ever talk. Okay? You would have to know that because they'll want to depose me every couple of months. I'm simply saying, well, anyone who tries to -- That has nothing whatsoever to do with this lawsuit. The causes of action in my lawsuit began in 1969, when I was enticed into the Sea Organization, and ended in 1981, where the Int actually -- they continue on because you guys have continued to harass me.

MR. RINDER: Not us.

MR. ARMSTRONG: I'm telling you what I'll tell them in a deposition, but they don't get anything else.

MR. RINDER: Okay. That's fine. We're in agreement --

MR. ARMSTRONG: You guys also have to have -- have your agreements worked out between yourselves, too, like -- I don't know who knows I'm involved, but I'll deny it.

MKR. RINDER: Okay. Well, we're going to try the thing out.

MR. ARMSTRONG: Good. The only reason that I would deny it is for your guys' skins. It means nothing to me, because I don't give a shit.

MR. RINDER: Right. Now, on this suit, we have gotten some legal advice on this. We have been doing quite a bit of work to gather the data. And there are some points that are a real concern about this (inaudible). Specifically, there are three criminal charges -- there are three specific things laid out as criminal charges, and our advice is if we don't have the facts to support that stuff, we are not going to be able to make any sort of PRO stick in the hearings on the preliminary injunction.

MR. ARMSTRONG: What about Homer Schomer and what's his name, John Nelson. I mean -- Homer Schomer, the guy was locked up, spat on and then you continue on with that, and he knows about thirty million dollars, in a period of six months, transferred unto LRH's account.

MR. RINDER: You're talking of -- You know, I got that. We are talking about the specific criminal things, not civil -- because there's a lot of stuff in here that's, like civil stuff. I'm talking about the criminal ones. There's two major ones, the first one being (inaudible) -- you know.

MR. ARMSTRONG: I'll tell you what. I'll tell what you I will do. Let me just back up a little bit. I think I have got an attorney and the guy is fucking tough.

MR. RINDER: Well, we've got an attorney.

MR. ARMSTRON: Are you okay on attorneys?

MR. RINDER: Yeah.

MR. ARMSTRONG: Go for it then.

MR. RINDER: What we are concerned about is on this point. They've been checking these out to find out what data we can find.

MR. ARMSTRONG: Let me talk to your attorney.

MR. RINDER: Well, we may arrange that or are he may arrange to get in contact with you.

MR. ARMSTRONG: You have a lot of faith in him?

MR. RINDER: Yeah. But what I'm concerned about right now is, somehow or other in this complaint there are at least three things that are listed down. Now, to us checking --

MR. ARMSTRONG: The complaint is based on information which he assumed you guys would have.

MR. RINDER: Who?

MR. ARMSTRONG: Whoever wrote it. Simply because, number one, the thing about Flynn, I don't give a fuck -- you know, Flynn is not (inaudible) for one thing. And the second point of that is, you don't take money which is -- you know, supposed to be used for charitable purposes and use it to defame and scandalize --

MR. RINDER: The point I'm trying to get across is, that's not criminal; that's the civil complaint. And that would have to be proven.

MR. ARMSTRONG: Show me the line you are talking about. You don't have to prove a goddamned thing. You don't have to prove shit. You just have to allege it.

MR. RINDER: Like, this is a little different from circumstances. Like if we allege that -- right? -- then we are not on the same position like where you were when you had a whole trial. You were like -- you know -- (inaudible) The position that you were in was -- you know, the Church is not believable to anybody. It's like, you know, it's got a bad reputation. That puts you in a position where the burden of truth (inaudible). We are not in that position because we are the Church.

MR. ARMSTRONG: You are the Church, but you guys are dedicated to the cleaning up of the Church (inaudible) guys who have control, should not have control. You are the Church and you should have control. And they abused (inaudible) -- illegally, because -- because simply, they should not do that. It all has to do with a crumby piece of money. Nobody gives a fuck about (inaudible) or whether or not the money is being used correctly, and whether or not the people who are, in fact, in control are doing it legitimately.

MR. RINDER: Yeah, but see, the thing is, what our advice is, is that in order to make the injunction -- a hearing for preliminary injunction stick, there's got to be some, like, criminal stuff.

That we gotta be (inaudible) --

MR. ARMSTRONG: How do you propose to render that? I can't. I told you what I can do.

MR. RINDER: What I was really asking you is -- Someone obviously put this together, whoever that may be. Someone put it together and it would appear that someone had data. We aren't able to find that data. We have found stuff that shows that, you know, what the Church has, but they're not true. Do you have something? Do you have something that we don't have that we could use to support those things?

MR. ARMSTRONG: Well, I told you, you could use Schomer. You could use the fact -- You could use the fact of anyone that you know of being locked up. It's illegal.

MR. RINDER: (Inaudible) That's the problem.

MR. ARMSTRONG: I was locked up.

MR. RINDER: Have you got an affidavit on that?

MR. ARMSTRONG: I have got a fucking ton of affidavits. I don't know where your guys' access is in the organization. I don't know.

MR. RINDER: Well, we can get a lot of shit. We've been working on this for, like, a couple of weeks now.

MR. ARSTRONG: You have affidavits?

MR. RINDER: Of criminal stuff, no. That's what I'm talking about.

MR. ARMSTRONG: Anything. You know, like all those things which we needed to document, even policy violations. How much are they paying to private investigators? Who runs the organization? Who's in control? That's what (inaudible) the Board members. (Inaudible) transition of the Board. Let's face it, you don't know that. If you guys are in a position in the organization where nothing is known --

MR. RINDER: Well, that's not the case. But the point is, we feel and our position is, unless we have something that's, like, strong that we can move in with and make a PRO stick, then going for a hearing and have it so that we can get that protection, we are going to be real -- we're going to have real trouble if we can't get a preliminary injunction that sticks in a hearing.

MR. ARMSTRONG: Here's the thing. Let me talk --

MR. RINDER: It will get thrown out.

MR. ARMSTRONG: Let me talk talk to an

attorney. I want to see whether or not, number one, the guy understands, and number two, that it's only a two-month appeal, anyway. You know, he doesn't have to stick around for years to go to trial on it. And if he does, you guys just back out. Whoever signs it backs up and says, "Well, I signed what I signed and you know, sorry you guys deluged us with paper. Too bad. You know, I'm not leaving the organization," or, "I am leaving the organization," or whatever they decide.

MR. RINDER: You mean kind of quit at that point, like if it wasn't done the way we wanted to, just pack it in?

MR. ARMSTRONG: Why not? That's the way it's got to be. (Inaudible) So what? Who the fuck wants to stay in that goddamned joint where you can't get --

MR. RINDER: I do.

MR. ARMSTRONG: I know you do, but you know -- You see, I don't know if it's like -- If you feel it's fine for you, then there is no reason to change it. If it's simply a motivatiuon of greed, then you guys are going to run into a lot of fucking troubles, anyway. So if you think that -- You know, it's really fucked the way things are and we shouldn't have all these goddamned lawsuits. We should be able to be to go wherever we want and talk to who we want and the fucking thing should make a lot of sense. And not only that, we shouldn't be charging people --

MR. RINDER: That's our position.

MR. ARMSTRONG: That's the motivation; it's fucking bullshit. Because it's a golden opportunity. I don't know what -- I don't know what's happening up in Canada. It's still happening; the thing has not come to fruition yet. They've got today, they've got tomorrow. Who knows what's going to happen? They keep talking. The last thing we got was (inaudible) bank account. (Inaudible) The fucking documents are coming in in the Armstrong case. The goddamned -- It's happening. Something is happening.

MR. RINDER: Yeah. You want it to move on this. We have gathered together --

MR. ARMSTRONG: Good. I need -- Number one, I need affidavits. Get the fuckers to me and let me see the attorney. Because obviously the attorney is in a situation where he keeps telling you something and he may not even have the goddamned concept. Are you following me?

MR. RINDER: Yeah.

MR. ARMSTRONG: I think I've got an attorney and I think we should put together twenty thousand bucks -- (Inaudible sentence).

MR. RINDER: Okay.

MR. ARMSTRONG: If you have got one, then (inaudible) --

MR. RINDER: We've got one.

MR. ARMSTRONG: Then I think --

MR. RINDER: We've got one, but what I'm asking you, from having checkd these things out, if there was something else that you have --

MR. ARMSTRONG: What is it you need?

MR. RINDER: Krentzman.

MR. ARMSTRONG: Okay.

MR. RINDER: There is nothing to show you that -- (inaudible)

MR. ARMSTRONG: Okay.

MR. RINDER: And there's Flynn.

MR. ARMSTRONG: Well, Flynn, we can put together. Do you know how much was spent on Flynn?

MR. RINDER: Two million.

MR. ARMSTRONG: It doesn't fucking matter. All that matters is that you don't spend two million dollars to PIs to commit a scandal like that. It is (inaudible) patently on its face illegal.

MR. RINDER: We are talking about -- Illegal? It isn't illegal. We have already checked that. It's not illegal to do that. That's the complaint that we are bringing. That's not a criminal matter. It's not -- That's not a crime.

MR. ARMSTRONG: Let's put it this way. There could be people going to jail over it.

MR. RINDER: I know that --

MR. ARMSTRONG: It's a civil lawsuit.

MR. RINDER: Yeah. But that's what -- It's a civil lawsuit, that's true.

MR. ARMSTRONG: Well, all you have to allege is that, number one, (inaudible) how much was spent by the organization at the orders of these people.

MR. RINDER: It's alleging things -- It alleges things.

MR. ARMSTRONG: That's fine.

MR. RINDER: That's going to take the whole trial, just like -- You know, I'm talking about the concern of a preliminary injunction. Alleging things is fine and alleging things we (inaudible) in certain cases is --

MR. ARMSTRONG: If you did, have them act immediately. That's all you have to do.

MR. RINDER: What is?

MR. ARMSTRONG: Is to say it. That's all that needs to be said.

MR. RINDER: We have a hearing and then we have a hearing for the preliminary injunction, that's like --

MR. ARMSTRONG: You have a lot of things going for you. If you follow on the tail of all these people being indicted at the top of the organization and the fact that all -

MR. RINDER: Yeah, but wait a minute. What's going to happen?

MR. ARMSTRONG: Hold on, hold on. Listen, we either are going ahead or we are not. Okay? I don't quite know what you are asking me, because I don't have the information on those three things.

MR. RINDER: Okay. That's what I was asking you, if you had something else you could get for us on those that would give us a stronger position.

MR. ARMSTRONG: That's what I'm telling you. If I were to get the affidavits on the outside from Schomer and from -- and from Nelson -- I don't know if Nelson will even talk to me, but I'll give it a try. And beyond that, I want to talk to the attorney. There is no one around, aside from

Michael Flynn, who has an understanding of this whole fucking thing like I do. And that's a fact.

MR. RINDER: Okay. I mean (inaudible).

MR. ARMSTRONG: What the fuck do you think? We talk every day about it. But that's not for you --

MR. RINDER: Okay.

MR. ARMSTRONG: I have no intention of hurting Mike Flynn, but I'm telling you he's behind it a hundred percent; absolutely behind it.

MR. RINDER: Right. Okay.

MR. ARMSTRONG: You know, we could use his affidavit alone, his affidavit along with, you know, copies of the -- of what they are doing. There is no proof against Mike Flynn. There is nothing. It's a bunch of hollow bullshit. And people were paid, criminals. A fucking guy in jail on a murder -- on murder who paid for testimony --

MR. RINDER: Okay. Look. I understand all that. (inaudible) back before. I just had the specific question that I was aksed. The one about do you have any other data that specifically supports these things that we unable to get.

MR. ARMSTRONG: Are you able to get money?

MR. RINDER: What do you mean, money?

MR. ARMSTRONG: How much for (inaudible), how much to attorneys? Figures.

MR. RINDER: Yeah, we can get the figures.

MR. ARMSTRONG: Give them to me. Ask for them. Ask for them. I've got to have fucking stuff relayed. I won't work if --

MR. RINDER: Who you going to relay that to, though?

MR. ARMSTRONG: We'll put the fucking (inaudible) in. Who is doing it? Who has the scene? Do you have any people that analyze data? Do you have a goddamned data bank? Do you have someone who's a courier? A fucking network setup? We have got to do it otherwise we're -- (Inaudible).

MR. RINDER: Right.

MR. ARMSTRONG: We've got to have a fucking thing that -- I don't even know who the fucking assholes are who photographed me. And get the number of the car. If you haven't got a guy who can walk around out in the fucking parking lot and get a --

MR. RINDER: Wait a minute, Gerry.

MR. ARMSTRONG: Listen to me. I am not as --

MR. RINDER: You are. You are giving me a bunch of shit like --

MR. ARMSTRONG: I am trying to fucking build a fire. We can do it. I'm with you a fucking hundred percent, but we can't (inaudible) the time constraints and all the other things get involved. I know you guys are under pressure. (Inaudible.) I'm trying to work with you. But I feel -- You know, I've got to be frank; if you don't get from me what the fuck's on my mind, what good am I to you? I'm trying to give you data as rapidly and as accurately as I can. I have a lot of questions. You know, boy --

MR. RINDER: Okay. I understand.

MR. ARMSTRONG: (Inaudible.) Anybody who can fucking write (inaudible). Give me a report. We can analyze them and go back in for the other specifics that are missing.

MR. RINDER: Okay. Okay, I understand.

MR. ARMSTRONG: (Inaudible) affidavits typed up or we can talk over legal shit with the attorney, because the time is right. Believe me, I am of the philosophic mind worrying really doesn't matter one way or the other when it's done or if it's done. But when I'm with you, I kind of try to speak my mind.

I'm not after you. I have a great deal of admiration and respect for you because it takes a fucking lot of courage to even walk out of the goddamned joint and to talk to me because I'm not exactly number one in the personality list. But I happen -- you know, by shear default I'm in this position where on the outside a lot of people talk to me, and I've got a fucking good legal mind and I can help out. I'm not -- And I know the guys involved and I'm not going to back down from them. I can help you.

MR. RINDER: Right. That's what we want.

MR. ARMSTRONG: But I can't help you -- oh you know --

MR. RINDER: I'll tell you something. I'll tell you something. There is a little -- I mean this is making me feel a little better, what we are saying, because there's generally people concerned with what's going on is that -- that you are in a position where you are giving us stuff. You are feeding us data. (Inaudible) -- What has happened so far is we've gotten these things and when we check them out, it looks like, well, maybe we are going to get shafted if we do this. (Inaudible) --

MR. ARMSTRONG: You happen to be in a position, you happen -- It just happens that I was in a position where I heard that there's a group inside and then things went from there. No one has any motivation to hurt you guys or use you guys at all. In fact, I am absolutely willing right now to say, "Listen, let's just end it, you know. Go back to -- go back to status quo." I wouldn't hurt you guys. I wouldn't talk about you. Let's just end it. I'm absolutely willing to do it. On the other hand, I do this because I think -- you know, I like to talk to people, I like to talk to you guys, and the fucking thing interests me to a great degree. It's extremely exciting, the possibility that exists here. But not only that, just in life and in life in general.

I approach things differently. I'm just -- you know, you get what you get. I'm not going to fuck you over. I'll support you as much as I can. You know I don't have any money and you know that I'm pretty strapped just litigating my own case. But I'll do what I can. And that's you will you get from me.

I've never in all the time I have dealt with him, I have never found Mike Flynn to lie to me or to -- or to be anything but decent. Not once. You know, he is like I am, he's -- you know, he gets pissed off every once in a while, a lot less than I do.

MR. RINDER: What --

MR. ARMSTRONG: That's all you've got and that's the whole way these things work, it's just on trust. That's all -- That's all you've got. I don't think anyone is setting you up. It may happen that you feel like, "Fuck, we have been set up." That's just the way live is. It pisses you off. You can't live in a cocoon in this goddamned place.

MR. RINDER: I understand that. All I was telling you was being up front and telling you what -- why there was some concern, what there is concern about.

MR. ARMSTRONG: You guys have got a goddamned committee; am I right? There's a committee?

MR. RINDER: Right, there's a committee.

MR. ARMSTRONG: It is not a democratic committee, I know, and it is fine. I think that, again, when you go back, whatever happens, happens. And it's okay with me. I couldn't give a fuck if you guys turn me in. You know, I would be disappointed, but I would get over it real quick because, you know, on the other side of that disappointment is the side -- you know, is a great mound of excitement.

You guys live in an exciting time and you've got a shot at it. And frankly, I've only met two of you, but I like the two that I met. I like Dan and I'd like to see the whole damned thing ended and I would like to see it ended in this somewhat exciting fashion. A lot of things are happening. I don't know what the fuck is going on out there, but -- they are (inaudible) they are not talking. So something is going on. Whether or not (inaudible). You know, these proceedings. You know --

MR. RINDER: Yeah. Definitely should --

MR. ARMSTRONG: (Inaudible) stir people up. I'm only one fucking guy out here and that's it. But I do -- But I do what I can.

MR. RINDER: That's not true; you are not just one guy. You've got tie lines to all sorts of people.

MR. ARMSTRONG: Just by default.

MR. RINDER: Talking to the CID all the time, talking to all those guys.

MR. ARMSTRONG: I'm talking to them by default. No one has -- there is no Che Guevara around. No one's risen from the occasion.

MR. RINDER: I'll tell you something. What I can't figure out is if there's some connection between your relationship to us and your relationship to them. So from their side, do you see what I mean?

MR. ARMSTRONG: You mean, are they using me?

MR. RINDER: Yeah.

MR. ARMSTRONG: No. Nobody is -- Nobody has given me the slightest indication of that. You know, every time I talk to the CID about -- about you guys, they say, "Gosh, have them talk to us." You know, they went to talk, they want to know about the way things are. That's about it. I don't know anything -- I don't have anything to promise them. What am I going to do? You know?

MR. RINDER: So they are interested in you, primarily (inaudible).

MR. ARMSTRONG: They are not interested in me primarily. The fact that I happen to have particular knowledge and I happen to be to some degree, at least, a clearing house of information. People contact me and they talk about this and I happen to be fairly well connected. That's about it. So they kind of use that, but I'm not a -- I don't know -- you know, what status I am as a witness as far as they are concerned. I know the language and I can -- and I can talk it. That's why they talk to me. And if they have a question they talk.

MR. RINDER: I understand. I mean, you know (inaudible)

MR. RINDER: I understand. You obviously are a good witness.

MR. ARMSTRONG: I'm a witness and I have -- and I have documents, but they have never talked to me about the documents under seal. Other than I gave them -- I talked to -- You know what a window of vulnerability is?

MR. RINDER: Yeah.

MR. ARMSTRONG: In law there is a certain thing; it's kind of like a reading of the law. It's like a window of vulnerability at a given time, is like something opens up. Like a window in space and you are vulnerable at that time. And so it just happened that Judge -- you remember Judge Petrous, who let the goddamned documents (Inaudible)

MR. RINDER: He was what?

MR. ARMSTRONG: (Inaudible) seal, he was talking about -- and then they were all sealed up again. And -- it was just hilarious, because ultimately (Inaudible) --

MR. RINDER: No one is -- There's no liability for that.

MR. ARMSTRONG: I don't feel -- I heard you guys's complaint, but I don't feel it's your liability. And everything that happened. Every time the organization makes -- that thing alone, you guys -- by simply saying that -- that you are Scientologists and there are these documents under seal, and frankly, Scientologists will never get to see them.

The organization has spent how much in Armstrong? It all has to be accounted for in the various cases. So you can say, okay, the organization, they spent ninety-three thousand dollars on PIs to push me around. It's a fucking crime to assault me. I got your crime. I was driven into. I was driven off the freeway. No fucking crimes. I'll give you an affidavit.

MR. RINDER: Okay. I don't know anything about that. It's like -- It's a little incredible to me they drove you off the highway.

MR. ARMSTRONG: That's right. I was driving a '71 Datsun. He turned right in front of me. He was a PI. I took photos of him. I've got a fucking bank of photos. And you will note in -- Did you read the -- Did you read the result of the hearing by Judge Breckenridge?

MR. RINDER: Yeah.

MR. ARMSTRONG: Did you notice -- oh, later on I think you guys gave documents, that was on

Ingram, and it was during the time we were looking into Flynn thing. Judge Breckenridge slapped down Peterson because he said that all the testimony regarding what the PIs did were uncontradicted. In other words, that's it. That's -- That is the issue. It's been litigated. It's right in print. That's what they did. And my wife was with me the whole time.

MR. RINDER: This thing that -- Yeah, I understand that. I mean obviously -- that was one of the points I had. Your suit, when you were fighting your suit there was like, you know, a little guy against this big organization that -- that tends to put you in a somewhat -- you know, a sympathetic-type of position. You know, it is like a big corporation versus, you know, some individual.

MR. ARMSTRONG: A big corporation is one thing, but bullies is another. That's the --

MR. RINDER: Yeah, but regardless of that -- but that's the -- one of the (inaudible) we are not going to hand you that position. We are going to have to establish the same sort of -- you know, whatever you established in your trial. You became believable and you became -- you know --

MR. ARMSTRONG: What do you mean became

believable?

MR. RINDER: I don't mean became. I mean you were believable.

MR. ARMSTRONG: Exactly.

MR. RINDER: You were believable on things.

MR. ARMSTRONG: Do you know why? Because the organization lies.

MR. RINDER: I don't understand how that makes you --

MR. ARMSTRONG: One guy who is telling the truth as he sees it. And it's obvious, and you know that the organization is lying. You never see us caught in a fucking lie.

And again, you know that the organization has bought professional muscle to push around -- guys that it -- you know. You kind of doubt -- you know, if someone says, "Well, your founder is full of shit. Your founder sucks eggs." You don't go out and hire a PI to push the guy around. That -- You guys are so fucking indoctrinated, you have no idea what the world is like out here. You might do that. You guys are operated like the fucking Russians, Russion Communist regime. (Inaudible)

MR. RINDER: Yeah. But the point of that is, -- well, lying for the cause -- I mean -- lying for the cause is a -- it's -- I consider this cause is something worth lying about. I lie about it every day.

MR. ARMSTRONG: I know.

MR. RINDER: So do you. I mean it's --

MR. ARMSTRONG: But there is a difference. There's a fucking big difference --

MR. RINDER: Right.

MR. ARMSTRONG: -- because --

MR. RINDER: You know, that's what I'm saying is, somewhere or another we have to be able to establish that so that that becomes our position. It doesn't matter if it's a matter of positioning, it has to be, because you can go in there and you can make allegations and everything (inaudible)

MR. ARMSTRONG: You are right. There has got to be a certain amount of PR attached to this. Just remember all the positioning is bullshit that the organization has involved itself in and all of its superior PR tech. Its PR sucks. But don't think necessarily that the way things have been handled by the organization is -- or even by me or by anyone else, is necessarily the way to go.

You guys have a situation of being very courageous individuals who are speaking out to rights and wrongs. That's it. And you are saying that the organization is using money that you guys worked for --

MR. RINDER: Right.

MR. ARMSTRONG: -- in a wrong manner and you're requesting --

MR. RINDER: I understand that. I understand that.

MR. ARMSTRONG: So the positioning is simply -- I'll tell you what the positioning is. The positioning is lies versus truth. Positioning is courage versus cowardice. That's your positioning. They lie. They lie.

Of course, they try it against all the -- -- you know, the -- (Inaudible) testimony for federal agencies. It doesn't wash with the federal agencies and with anyone.

MR. RINDER: Right.

MR. ARMSTRONG: And that's because it's already known that they lie. What you are saying, "I'm fed up with my organization lying. I'm here to clean up the goddamned act. And the way I" --

MR. RINDER: (Inaudible) So we have a better chance of making our stuff stick; right?

MR. ARMSTRONG: Well, you have to prove these things and you have to have people -- you have to have real names on the bottom of the damned things. And you have to have people who are going to be willing to talk to the press immediately; who are going to know what the fuck is going on and better have their language together -- you know, better be pretty fucking distant from the party line in there. Because if they're spewing the party line, which everyone sees as a bunch of bullshit, you are in for a lot of trouble. But if you say we are not , absolutely not, you are here to save Scientology, you are not here to destroy it, that again is another lie perpetrated by the organization. Who the fuck wants to destroy it? That's just another lie. They lie.

MR. RINDER: I'm sorry, I thought you were saying we were going to destroy the organization and that's a lie.

MR. ARMSTRONG: No.

MR. RINDER: I got it.

MR. ARMSTRONG: It isn't like -- it isn't like a big thing. It's just a dicotomy. You are suing them because, one, you are honest and you want the facts known; number two, they are spending money on illegal things, and here they are: one, two, three, four, five. They are spending so much money, so go after -- attach the fucking --

MR. RINDER: Right.

MR. ARMSTRONG: -- the goddamned officials fucking freedom. Go after them.

MR. RINDER: Okay. Somewhere or another -- Some way or another we accomplish that. That's what we've got to accomplish. (Inaudible) that sort of a position. We -- You accomplished a lot. I mean, and you even say that put me in a position where, you know, I'm kind of stuck with that because I did accomplish it.

MR. ARMSTRONG: Let me give -- I appreciate that. Let me just give you one word of advice. In my opinion, it is necessary, not because of everything that's happening up in Canada, for you guys to act fairly rapidly, and it's a very logical reason. The Armstrong case brought to the surface a great number of documents. All right?

MR. RINDER: Yeah.

MR. ARMSTRONG: Documents which show fraud. Right? Do you agree?

MR. RINDER: Well, I haven't seen all those things. I don't know what they show and what they don't show. I have no idea.

MR. ARMSTRONG: You saw what the judge said. Be realistic, you saw what the judge said about Hubbard.

MR. RINDER: Yeah, I have seen the judge's order. Yeah.

MR. ARMSTRONG: That's the kind of the way it is. Now, what has --

MR. RINDER: That puts --

MR. ARMSTRONG: I have a fraud count. I have a fraud case; just about everyone else has a fraud case, and they now have the documents. Fraud -- A statute of limitations for fraud runs from the date -- I believe it's a two-year statute, and it runs from the date of the --

MR. RINDER: -- discovery

MR. ARMSTRONG: -- of the fraud. There is going to be a run on the bank.

MR. RINDER: I understand. I understand what you are saying.

MR. ARMSTRONG: Nip the goddamned thing in the bud before that happens. Otherwise, you are all going to be left holding a very empty baG --

MR. RINDER: We don't want that.

MR. ARMSTRONG: -- one with a lot of indebtedness attached to it. More lies.

MR. RINDER: We are not interested in that.

MR. ARMSTRONG: Exactly.

MR. RINDER: And that is why -- (inaudible) like, let's move.

MR. ARMSTRONG: And that's why you if you guys frankly want to save Scientology, fuck them; slap those guys down.

MR. RINDER: Okay. I understand that entirely. That's -- We are moving in the same direction on that. We're moving in the same direction. The point is, for us to take a look at this and make sure we are moving in the right fashion, not in doing things that are going to fuck us up. I know you can't guarantee what's going to happen. But there are certain things that you can do to try and --

MR. ARMSTRONG: You can be real sensible about it.

MR. RINDER: We can be sensible about it.

MR. ARMSTRONG: Listen. Who are the fuckers who photographed me? (Inaudible.)

MR. RINDER: I'll tell you something, straight up. Right now?

MR. ARMSTRONG: Yeah.

MR. RINDER: I didn't even bring the license plate number. That's straight up front.

MR. ARMSTRONG: You have it?

MR. RINDER: Yeah. The reason I didn't bring it is the way I told you, because I came here to get some data (inaudible) there was concern about you were setting us up and therefore why should we give you --

MR. ARMSTRONG: Who is the most concerned? Who is the guy in your committee who stirs the most shit? Is it you or someone else? Who is the guy?

MR. RINDER: Why?

MR. ARMSTRONG: Because I want to fucking talk to him. (Inaudible).

MR. RINDER: No, I won't.

MR. ARSTRONG: Frankly, I'm not (inaudible) trust you either. (Inaudible).

MR. RINDER: Okay. Well, I think that will -- I think that this will help on that point.

MR. ARMSTRONG: All I've done is (inaudible). In any case, let me ask you a couple of things. I would like to -- you know, it's difficult for you to get out. I'm only going to be here possibly to December 18th. I'm going to be gone for three weeks; I will be up in Canada.

MR. RINDER: Going home, huh?

MR. ARMSTRONG: A lot of things. I'm getting -- My wife and I are splitting up. That's for you alone. Don't let that get inside the organization. Well, this is fine. No problem. She's cool and she's protected by -- you know, allow for privilege --

MR. RINDER: Allow for privilege? I don't know what that means.

MR. ARMSTRONG: Everything that we have ever discussed, she will not talk about it.

MR. RINDER: Have you discussed that with her?

MR. ARMSTRONG: No. She knows -- she has known for some time because she was there when Dan told all of us. She knows no names. She knows nothing else. She knows occasionally I go out to meet people. She doesn't know who or anything.

MR. RINDER: Is she any risk to us?

MR. ARMSTRONG: I don't see she is any risk to you. Everyone is a risk. That's what it's all about. You run towards the risks. You stay after them and grab them by the fucking throat.

Get me those guys' names, please, whoever the three were. Do you know one of them? Do you know who they were?

MR. RINDER: No, I don't know who the people were.

MR. ARMSTRONG: Okay. One of them was -- had reddish hair. He looks like he'd be in his late twenties. Good looking kid, fairly tall, six one.

MR. RINDER: Okay. I know what you want on that. The problem is not knowing what you want.

MR. ARMSTRONG: A blond guy -- I guess these guys are all security personnel -- long blond hair. Those were the two that I ID'd definitely. I have seen them around the organization.

MR. RINDER: Okay.

MR. ARMSTRONG: I've got to -- You've go to go. I've got to know about your attorney. You know, are you guys just going to take it, and what do I have to do? I need to know. I need to know have you got any -- have you got any money? Are we really going ahead? Should I drop it with the district attorney?

MR. RINDER: Don't worry about the district attorney right now. We have -- Our guy is handling this. We have figured out -- we've even figured out who we can make the external trust to. We have some work on that.

MR. ARMSTRONG: Okay. If there's an attorney and he has questions, legal questions to bat around, he should call Mike. The only problem with him calling Mike is, Mike is not going to know who the fuck he is. Are you following me?

MR. RINDER: Yeah.

MR. ARMSTRONG: So I have to know who he is in order to make the introduction, because without that, there is a problem. Because the guy could be -- Mike is going to think, "Who the fuck is this guy setting me up with the organization?"

MR. RINDER: I understand.

MR. ARMSTRONG: Is he retained? I need to know that. Is he retained?

MR. RINDER: Why do you need to know that?

MR. ARMSTRONG: Why the fuck can't I? Like I say, nothing goes beyond here. Because I need to know what the fuck is going on.

MR. RINDER: You see, that's where there is a slight difference of opinion, is that we don't think you need to know everything that is going on with us. There is no reason for that. Why? I already told you that we have an attorney. We have someone that's been helping us with this and moving up. That's enough. You don't need to know anything more than that.

MR. ARMSTRONG: Like I say, he should -- He has legal questions, he needs someone with --

MR. RINDER: The questions about the data, about what data we have, that was the question.

MR. ARMSTRONG: Do you guys have anything more? Are we --

MR. RINDER: No, not quite. Do you remember earlier you told Joey and Danny about -- about putting together some docs? They say we can do it if we get ahold of Ingram.

MR. ARMSTRONG: I wouldn't want to touch it with a barge pole. Don't need to.

MR. RINDER: Why not?

MR. ARMSTRONG: I don't even want to discuss that matter.

MR. RINDER: Okay.

MR. ARMSTRONG: I can't see any relation -- you know, (inaudible) if that was our aim, you know, we wanted to smack some people and really mess them up good, we could do some things, but -- I don't have any idea on that. I think that -- You know, if you guys are going ahead, then I think that -- go for it and kind of let it shake out the way it is.

MR. RINDER: You don't see anything in trying to push this a little harder? Because that was -- that was what we got on the original idea on that, and it sort of died, you know, sort of nothing ever eventuated from it, but it was talked about a number of times.

MR. ARMSTRONG: (Inaudible).

MR. RINDER: We have access to -- We have access to a lot of stuff. There is no question that we have access to it. It's a matter of how do we utilize it and what do we put together?

MR. ARMSTRONG: Do you know anything more about the Tamimi situation?

MR. RINDER: We checked all that out on this thing. We checked out all the stuff that these guys have got; everything, we checked: all the affidavits, photos, everything.

MR. ARMSTRONG: The affidavits?

MR. RINDER: Of those guys? Yeah.

(Someone walked by and asked them questions.)

MR. ARMSTRONG: Well, what do you think? Have we come to an impass here?

MR. RINDER: No, I don't think so.

MR. ARMSTRONG: (Inaudible) Do you need me for any of this shit? You feel like you have got the whole thing under control, like I can ease out of the picture?

MR. RINDER: I don't want to do that?

MR. ARMSTRONG: No. But I feel like I'm, you know, kind of like -- you know, I am -- kind of called up here to find out whether or not you can trust me. For what? You know, for --

MR. RINDER: Well, be that as it may, that's what occurred today. You know, that's like --

MR. ARMSTRONG: I understand. It just seems like --

MR. RINDER: I am in a bit of a strange position, because I've got to go back and if I go back and do what really is wanting-to-be-heard type of thing, it doesn't work. And that's all there is to it.

MR. ARMSTRONG: Is there a top dog? Is there like someone who is the fucking force behind this (inaudible)?

MR. RINDER: Yeah.

MR. ARMSTRONG: Are you it?

MR. RINDER: No.

MR. ARMSTRONG: Is he the guy that has to be convinced? Because I would like to talk to someone, you know.

MR. RINDER: What do you want to say to him that you haven't said to me? Anything?

MR. ARMSTRONG: Yeah. I really want to -- I want to know where does it sit with the attorney? Is the guy going to go with it? I mean, you know, where are the affidavits? I gotta -- (Inaudible) they can be set up and structured.

(Someone came by and asked for extra change.)

MR. RINDER: I asked you about Mr. Falk. And this is sort of an additional thing. What is the real thing as regards us not getting shafted by the agencies (Inaudible) or if they -- we make our move? Can we get any sort of a guarantee that we won't get shit on by the them?

MR. ARMSTRONG: I think you guys should talk to them and let them know what the fuck you are doing and that you intend to clean up the goddamned place.

MR. RINDER: What if they say -- I mean you told them about us, obviously. (Inaudible) I mean, the trouble with that is, we would get ourselves two (Inaudible), that's it. We can be subpoenaed. They can do whatever they want with us at that point.

MR. ARMSTRONG: There's definitely a certain amount of risk in it, but they'll meet with you under any circumstances. And no names. But obviously, they are looking for -- they are looking for information through the (Inaudible) lines, so they said. They're after this guy, L. Ron Hubbard.

MR. RINDER: (Inaudible) What's your opinion on it? Where do you think they would sit?

MR. ARMSTRONG: My opinion, again, all of them that I have dealt with, is that they are very realistic and very decent people. You know, they are probably hot shot American university boys who got plucked by Uncle Sam out of their graduating classes of their respective universities and put into law enforcement. CID is -- I mean they're gun-toters. They are like the FBI, they are enforcement. They are not like, you know, all the other FBI cases that are now going on. You are all looking at defensive actions. It's like dealing with a bunch of attorneys. FBI does not, to my knowledge, currently have an investigation going. CID does and various other agencies do. But my opinion is that what -- what's happened is that a transition of power will occur and then your attorneys will be dealing with, as the organization's attorneys have, the various government agencies. It will just be a transition.

You simply have to fire your old attorneys and you have to look at whether or not they fucking misrepresented you, whether or not they should all have their asses slapped for malpractice, because they have taken a lot of money and guys haven't won a goddamned suit. Okay?

MR. RINDER: I have a question about that. What if we say, like they obviously know about your dealing with us to some degree. Are they within their rights to move on us for this, like trying to get us into deposition about what we are doing with you?

MR. ARMSTRONG: No. I don't see how they can. They don't know who you are.

MR. RINDER: But they could ask you.

MR. ARMSTRONG: Yeah, well, I will never tell 'em -- you know, until you guys say, "I want to talk." At which point -- you know, that's just the way it is. I will tell them I don't know anyone's name.

MR. RINDER: Okay. What's the point of --

MR. ARMSTRONG: I see no downside regarding those people for you guys. They did -- Everyone I have talked to, in Justice and CID and everyone, says, "Well, basic operators like a business." So there is going to be a transition. It's gotta change. It cannot continue. There is an awful lot of opposition to it. So it's going to change. And you guys, if you take over, are going to end up dealing with the government agencies exactly like the organization does now, the difference being you are not going to spend a billion dollars to come up with nothing. You have got to clean up the ship. It has to be -- you can't -- you know, the organization cannot continue being so fucking righteous.

MR. RINDER: Can we go into this with a prudent --- say, an expectation that -- that if we were to actually accomplish our takeover, that we wouldn't then have to be part of the (Inaudible) quarrel with those guys? Just like when you said, you know, you don't want to take over an entity which has nothing left but just a bunch of debts.

MR. ARMSTRONG: No.

MR. RINDER: We want to take over something like (Inaudible).

MR. ARMSTRONG: No. I'll tell you this. If you guys were to say, "Listen, we want to take over, we want to clean it up, we are willing to make our books available to you, we are willing to open the whole damned thing up, because we want to know like you want to know. We want to know where every goddamned penny has gone and we want to know what the fuck it's been used for. We want to know if any our former parishioners, specifically Miscavage and company or whoever, have some villa in Switzerland."

MR. RINDER: Now, will we be liable for anything that had occurred through this place? Do you see what I mean? If we are taking over now, we are the Church. Would we then become liable if there is stuff -- will we then become liable for that? Are we going to end up being in the hot seat about that stuff?

MR. ARMSTRONG: I don't see how you can be. I don't see how you can be. What -- what cases exist? What if something has happened? You people weren't the organization then. You have -- You know, statutes run on virtually everything from back in the Mary Sue days. And if you are into something more current, then I think, again, you guys have solved that problem just by filing a lawsuit. I don't see that as any problem. I really don't. You know, there may be individual things. Let's say one of the guys hauled off and hit someone, who was an asshole, you are just going to have to handle that.

By the way, you guys have the information on this Scottish inn keeper?

MR. RINDER: I don't know.

MR. ARMSTRONG: Some asshole was held and Miscavage belted him. And it's criminal activity.

MR. RUNSTEIN: Well, okay.

MR. ARMSTRONG: I'm telling you --

MR. RINDER: That's fine. I understand.

MR. ARMSTRONG: Don't cast that sort of stuff off, because I've given you ideas and someone is going to come up with an affidavit John (inaudible) stated this.

MR. RINDER: (Inaudible).

MR. ARMSTRONG: You asked me what I knew about things. I can come up with -- The guy in England -- what's his name? -- Jay (inaudible), who wrote some document which listed out a number of people, (inaudible) Roger Barnes (Inaudible). Somebody -- you know, (inaudible) -- that's important to you guys, because you have to get across to the immediate hearing judge what can be expected.

MR. RINDER: That's exactly what -- That's exactly what I was talking about on this thing.

MR. ARMSTRONG: I have been saying it all along. You guys can simply say --

MR. RINDER: I've got --

MR. ARMSTRONG: -- that's the danger you're in now.

MR. RINDER: I've got --

MR. ARMSTRONG: (Inaudible).

MR. RINDER: I've got -- Yes. I do agree with that. That's fine.

Listen, I have a question. Can you -- I don't know if you have ever even brought this up to the CID guys. Is it -- You know, would they even answer that question?

MR. ARMSTRONG: What?

MR. RINDER: What would their position be?

MR. ARMSTRONG: Their position would be to work with you guys. It would be that. You are swapping. What you are swapping is, we will work with you. We will open our books.

MR. RINDER: And that will give us, therefore, immunity from anything --

MR. ARMSTRONG: -- that may (Inaudible).

MR. RINDER: There is a liability to that. If we open our books, we are now in charge, well, if there is something in there, do we then become liabel for that?

MR. ARMSTRONG: No. Why?

MR. RINDER: Because who else is the head of the corporation now?

MR. ARMSTRONG: Because you are there. And it is a corporation which has been vandalized, which has been ripped off. How much (inaudible) I don't see how.

MR. RINDER: I understand.

MR. ARMSTRONG: I want to talk to people. I don't give a fuck who. I don't have a lot of time. You know, I'm going to be around for eighteen more days max.

MR. RINDER: Okay. I mean we have been trying to get ahold of you about it, because we are moving ahead. It's not like a stall or anything. We are moving.

MR. ARMSTRONG: When you talk to the attorney, call me in just for goddamned information. From then, I want to talk to him and I want to put him in touch with Mike Flynn, because he has got to get the legal -- You know, I deal with this thing on a couple of levels. First there is the minutia which we are talking about right now, little details.

MR. RINDER: Right.

MR. ARMSTRONG: But then there are big,

broad, goddamned legal concepts which are important for an understanding of the whole thing and the way it can be resolved. There is a lot of minutia which I don't know about. But the ultimate legal concepts I grasp pretty quick.

MR. RINDER: Okay. Flynn could definitely --

MR. ARMSTRONG: Flynn is a fucking good attorney and he knows it and he can help the guy.

MR. RINDER: He could even, like --

MR. ARMSTRONG: (Inaudible).

MR. RINDER: Yeah. (Inaudible)

MR. ARMSTRONG: (Inaudible) one on the arm. What's the situation with him?

MR. RINDER: Okay. Yeah, it's a fairly good idea. Someway or another, you have already accomplished it, so you are to some degree, you have lied. (Inaudible) So you, to some degree, have a viewpoint. You have managed to accomplish something, so that is definitely your taking into consideration. You know what I mean?

MR. ARMSTRONG: Yeah.

MR. RINDER: (Inaudible) here's. I mean to be totally frank with you. I read that. I read the judge's order. I find that I (inaudible) a -- that you -- joined the Scientology because of what LRH had represented as his background.

MR. ARMSTRONG: Didn't you?

MR. RINDER: No. Why?

MR. ARMSTRONG: Did you think the guy --

MR. RINDER: No. I didn't (Inaudible) --

MR. ARMSTRONG: Did you think that the guy was a pathological liar?

MR. RINDER: All I knew was that -- The reason that I joined and the reason why everybody else I know, which is why it was brought up, is the technology made some sort of sense. This looks like something I can get interested in.

MR. ARMSTRONG: What keeps you in the Sea Org for ten bucks a week? Because you think --

MR. RINDER: It's the same thing. I still believe in the technology.

MR. ARMSTRONG: Right. Because you -- you (Inaudible) supposed to help. The purpose of it is to help Ron clear the planet. Help Ron do such and such. (Inaudible) The fucking guy lied to us.

MR. RINDER: Anyway, that's a --

MR. ARMSTRONG: It's important to someone definitely on the outside. You know, all of a sudden one day you might find -- I'm not saying you will, but all of a sudden you might find -- you realize, you know, for fuck's sakes, the guy did lie. You know, what exactly happened? Okay. I've got these goddamned levels. Am I really OT?

MR. RINDER: I don't know.

MR. ARMSTRONG: I thought -- you know, it's a bit of a shame about Judge Breckenridge at this point that he's getting attacked by these assholes, but he's -- you know, the guy is a courageous, strong -- he's a funny man, and that's about it. He was extremely fair. And all this shit about comments that he made about them is so much horse pucky, more bullshit, more lies by their fucking (Inaudible) attorneys. It's just pure -- it just disgusts me that attorneys are that fucking low and the organization's got them.

I got to go.

MR. RINDER: Me, too.

MR. ARMSTRONG: Well, if somebody can't get out on a regular basis (Inaudible)

And just as an aside, tell them this is absolutely the last time to you get to check me out to see whether or not (inaudible).

MR. RINDER: Okay.

MR. ARMSTRONG: After this, they can go fuck themselves. (Inaudible).

MR. RINDER: Okay. We will be in comm.

MR. ARMSTRONG: I want to talk to the attorney. (Inaudible) Pass the word.

MR. RINDER: Okay. Drive safely.

(End of videotape.)

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THE COURT: Members of the jury, we will recess for lunch. Please remember my cautionary instructions. Leave your notes locked up in the jury room. We will resume at 1:30.

(Jury was excused.)

1:30 gentlemen.

(Court recessed at 11:56 a.m.)

(Pages 5052 to 5249 are being reserved
for the transcript of the video tapes
of Mr. Armstrong.
Court reconvened at 1:41 p.m.)

THE COURT: Are we through with video equipment?

MR. COOLEY: As far as I'm concerned.

THE COURT: Why don't we take that out of here.

MR. WADE: Fine, Your Honor. Your Honor, the only -- we have two matters. One matter concerns the documents which have been marked 257 through 261, and Exhibit 264. Those are the Flag Mission Orders which we have offered. We will reoffer those again, Your Honor.

THE COURT: What is 264?

MR. WADE: 264 is an additional Flag Mission Order.

THE COURT: You mean a file like the ones we have over here. So you are saying there are six files?

MR. WADE: Yes, Your Honor.

THE COURT: Six mission orders, each one consisting of five?

MR. WADE: Yes, Your Honor.

THE COURT: Is that my understanding?

MR. COOLEY: 257 through 261 is what I have, but there is also a 264, Your Honor.

THE COURT: I know that, and that's why I'm asking. There is 257, 258, 259, 260, and 261. And there is also a 264.

MR. COOLEY: That's a mission car services.

MR. WADE: Yes, Your Honor, this is 264 FMO 1402.

THE COURT: That is one that I looked at?

MR. WADE: Yes, Your Honor.

THE COURT: Okay.

MR. COOLEY: We were discussing on Friday the Court was going to consider how those were going to be handled. As I understood the basic purpose of the offer was to show the size of mission files available on Mr. Armstrong, and not so much the contents. Those documents in there, I don't know what they number, but they certainly are a significant number. If the exhibits are going to be marked en mass like that, it seems to me it presents a serious problem of exhibit handling and it presents me with a serious problem on recross.

I had suggested that the -- if it's the volume that they are looking to show, take pictures of the stacks and put those before the jury so we don't have to get ourselves sidetracked with all of the documents that are in there. If they wanted the documents that were in there for any purpose, they could offer those that they wanted, but I don't understand that to be the purpose of the offer at all.

MR. WADE: There are one or two of the documents which we wish to use, Your Honor. The bulk of the documents are being offered just to show the retention of documents by the Church of Scientology.

THE COURT: My understanding was just merely to show they do keep files on various things.

MR. WADE: Yes, Your Honor.

THE COURT: As I understand, Mr. Cooley's objection to that is simply that if you are not going to ask about the contents of each folder, we have a lot of the documents the jury is going to be wading through that are not necessarily germane to any issue that anybody is raising.

MR. WADE: One of the ways to take care of that, Your Honor, is the one or two documents which I refer to are in Exhibit 264, which I will refer to in Mr. Armstrong's redirect examination. The others can be marked for illustrative purposes only. It would not go to the jury when the other exhibits went to the jury after the evidence is closed. However, they could be exhibits so they can look at them, as they have already looked at them.

THE COURT: I don't mind that so much. I understand Mr. Cooley's proposition, because then if we go into each document, it's cross-examination on each document; it's a matter for the jury to read each file, and I don't think that is necessary if it's not the purpose. For illustrative purposes, to say here's a file and here's what they keep on certain things, I've got no problem with that.

MR. COOLEY: I don't either.

THE COURT: Okay.

MR. WADE: The other matter is we do not wish to use them at this time, but the documents which we have marked and the documents reviewed by the Court in camera, we would like to obtain copies of those as soon as possible.

THE COURT: Those you have to have a ruling on, too, don't you?

MR. COOLEY: Yes, Your Honor. I think the Court has to review those with counsel, so I can point out to the Court what my problems are. But if they are not going to use them at this time, I don't imagine there's any rush on that, so we have to hold up the jury.

THE COURT: Okay. Let's set aside some point of time so we can do that. Perhaps one morning earlier we can give ourselves an hour and do that before we start the jury.

What is my schedule tomorrow?

THE CLERK: I don't have the docket.

THE COURT: My idea at the moment is to pick a morning. Meanwhile, 257 through 261 and No. 264 are received for illustrative purposes only.

MR. COOLEY: Not to go to the jury.

THE COURT: Not to go to the jury.

Mr. Armstrong.

(The witness resumed the witness stand.)

THE COURT: I do have something tomorrow.

Okay. Get the jury.

(Following proceedings held in the presence of the jury.)

MR. WADE: Would you please hand Mr. Armstrong the exhibits we discussed during the break.

(The court clerk handed exhibits to the witness.)

BY MR. WADE: (Continuing)

Q. Mr. Armstrong, the first exhibit handed to you, I believe, is Defendants' Exhibit No. 886; is that correct?

A. All right.

Q. Now, Exhibit 886 is the defendants' exhibit and I believe that's a Hubbard Communication Office policy letter of February 14, 1966. And that's a document which it reads that, first paragraph: "In protest against the abuses and murders carried out under the title of Doctor, I abandon herewith all my rights and legitimate use of this title, as the name has been disgraced."

Mr. Armstrong, I would like you to take a look at Exhibit 191.

A. Yes.

Q. You know, Exhibit 886, the policy letter, is February of '66. Exhibit 191 was presented in evidence in your direct examination. I believe, is that a brief biography of Mr. Hubbard, L. Ron Hubbard?

A. Yes.

Q. I notice at the top it says, "Originally printed in circa 1960."

Do you know if this document was reprinted at any time after February of 1966?

A. Yes, it was.

Q. And where was it reprinted?

A. It was reprinted by the organization. I saw it in 1969, 1970.

Q. What publication did you see it in?

A. I saw it in a couple of publications. It was a handout at the time. I also saw it in something called PRO News. In fact, this one here appears to be from PRO News, 1970.

Q. What you are referring to is on the last page it says, "This article is made available through PRO News," and then it gives an address to PRO News.

A. Yes.

Q. Would you please take a look at the heading under the second Hubbard heading, under vital statistics. The fourth line down, please read the notation which concerns the Ph.D.

A. Ph.D., Sequoia University, 1950.

Q. Mr. Armstrong, will you take a look at Exhibit 192.

A. All right.

Q. Exhibit 192 is dated, I believe, 8th of March 1967?

A. Yes.

Q. And this is the article having to do with the Who's Who in California?

A. Yes.

Q. Would you take a look at the second page of that document.

MR. COOLEY: What's the exhibit number?

MR. WADE: Exhibit 192.

BY MR. WADE: (Continuing)

Q. That's the page in Mr. Hubbard's handwriting; is that correct?

A. Yes.

Q. And would you please read -- see if you can find anything that concerns a doctor or a degree in philosophy.

A. "Obtained degree in philosophy in 1950."

Q. That's in Mr. Hubbard's handwriting?

A. Yes.

Q. That's in 1967?

A. Yes.

Q. Would you please take a look at Exhibit 193.

A. Yes.

Q. Is this also data from the Who's Who in California?

A. Well, it contains the same information. I can't tell you that.

Q. Do you know when this document was prepared?

A. I can't date it exactly.

Q. Okay. Let's go to another one. Have you ever seen what are known as Professional Auditors Bulletins?

A. Yes.

Q. And this, I believe, is a Professional Auditors Bulletin. Would you identify that.

A. This is a list of -- or a pack of Professional

Auditors Bulletins. It contains a number of what were called PABs, PAB, Professional Auditor Bulletins.

Q. Can you tell by looking at the book who it's published by?

THE COURT: Does this have a number, Mr. Wade?

MR. WADE: Your Honor, what we have done is numbered Exhibit No. 265, which is the front cover, the first two pages, and then the bulletin we will be discussing and offering in evidence, instead of offering the entire book.

THE COURT: What is he looking at now? Does it have a number?

MR. WADE: This doesn't have a number, Your Honor.

THE COURT: All right. Okay.

BY MR. WADE: (Continuing)

Q. We have marked as Exhibit 265, and I believe you have that with you, the front page of the Professional Auditors Buletin, the second page, and then a Professional -- a single Professional Auditors Bulletin, which appears at Page 41 of that document.

Would you please look and see if you can determine who published it and the date of its last printing.

A. The book, itself, is published by Publications

Organization, Scientology Publications organization, AOSH DK Publications in Copenhagen, Denmark. It was earlier published by another group. Scientology -- the Denmark corporation was not then in existence, but this particular pack of Professional Auditors Bulletins was published by them.

Q. What is the date of -- I believe it's the fifth printing?

A. 1975.

Q. Would you please turn to Page 41.

A. Okay.

Q. Would you read under Translator's Edition, who wrote it, what it states there.

A. "By L. Ron Hubbard, PH.D, CE."

Q. Would you now turn to Page 3, which is Page 43 of the book, and read the part which begins "Who invented Scientology?"

A. "Who invented Scientology? Scientology was discovered, found; not invented, created. It was organized by L. Ron Hubbard, an American, who has many degrees and is very skilled by reason of study. Sometimes wundtian psychologists" -- that's w-u-n-d-t-i-a-n -- "defend themselves by saying Hubbard is insane. Actually the Chicago Psychological Institute, a wundtian organization, gave Hubbard many tests at his own request in January of 1951 and found him unusually bright and extremely sane. Hubbard was trained in nuclear physics at George Washington University in Washington, D.C., before he started his studies about the mind. This explains the mathematical precision of Scientology. Dr. Hubbard has been given many honors in his work in the field of the mind. He has been assisted by one of the most numerous organizations in the field of the mind on Earth today: the organizations of of Dianetics and Scientology. Scientology organizations contain more members than all other mental health organizations combined."

MR. WADE: Your Honor we would offer Exhibit 265.

MR. COOLEY: No objection.

THE COURT: 265 is received.

(Plaintiff's Exhibit No. 265 was admitted into evidence.)

BY MR. WADE: (Continuing)

Q. Are you familiar with what is known as the the "green books," the OEC volumes?

A. Yes.

MR. WADE: We are not marking these as exhibits, Your Honor, but this is a document contained in them that's a prior exhibit. What I would like to have Mr. Armstrong do, I would like to have him go through -- that, I believe, is Volume 6 of the Organizational Executive course.

BY MR. WADE: (Continuing)

Q. I would like you to go through the two volumes, find out when the -- where the book was published, and then read to the jury the part in the PE handout, which is already an exhibit, which refers to Mr. Hubbard as a doctor.

MR. COOLEY: What volume is he looking at now?

MR. WADE: He is looking at Volume 6, two copies of Volume 6.

THE WITNESS: The last date on this Volume I have in my hand appears to be 1974.

MR. COOLEY: What page are you looking at, Mr. Armstrong?

THE WITNESS: 196. That is for the -- the PE handout. The copyright page appears to be Roman Numeral IV.

MR. COOLEY: Excuse me. I'm confused, Your Honor. I'm looking at Page 196.

THE WITNESS: 196 is the PE handout, which has been given to me. I was asked the question: what was the year of the printing? That volume, 1974; the second volume is reprinted in 1982.

MR. WADE: (Continuing)

Q. Do both those volumes, the 1974 volume and the 1982 volume, contain the same PE handout?

A. Yes.

Q. Would you please look at that PE handout and read to the jury any parts of it which refer to Mr. Hubbard as a doctor or Ph.D., if there are such parts.

A. "Developed by L. Ron Hubbard, CE, Ph.D., a nuclear physicist. Scientology has demonstrably achieved this long-sought goal. Dr. Hubbard, educated in advanced physics and higher mathematics and also a student of Sigmond Freud and others, began his present researches thirty years ago at George Washington University."

Do you want me to do the whole paragraph?

Q. That's fine, Mr. Armstrong.

A. Okay.

Q. Mr. Armstrong, will you please look at Exhibit 267.

A. Okay.

Q. There have been discussions concerning what I think has been termed the "Gerry Armstrong Project," a project against you by the organization after you left. Can you identify Exhibit 267? Tell the jury what that is.

A. This is the first information that I have regarding the Gerry Armstrong Project. This is what began what I called the Gerry Armstrong operation. This is dated 17 February 1982.

THE COURT: Excuse me, Mr. Armstrong.

Is this 267 now?

MR. WADE: Yes, Your Honor.

THE COURT: What happened to 266?

MR. WADE: 266 is another exhibit we may or may not offer, Your Honor.

THE COURT: It would really be a big help to me inasmuch as I have so many open holes on this exhibit list, if you could use them in sequential order so that we could not have the degree of openings that I have got on this list right now. Try to determine which ones you are going to use, and it would really help me and the clerk if you could do it sequentially.

MR. WADE: We certainly will continue to attempt to do so, Your Honor.

THE COURT: Thank you.

MR. WADE: Thank you.

BY MR. WADE: (Continuing)

Q. Mr. Armstrong, would you continue to explain what Exhibit 267 is.

A. This is a project originated by B1 Intelligence Unit of the Guardian's Office beginning in 1982 after I left the organization. I had already, by this time, perceived that the Intelligence personnel were, first of all, trying to track me down and that they were contacting my various friends. I knew the way they worked. I did not know of this document until it was produced in my B1 materials.

Q. When was this document first produced, Mr. Armstrong?

A. I first saw it in the end of February this year when I first came up to Portland in order to testify in this case.

Q. Would you please just give the title of the document and the date.

A. It's called "Gerry Armstrong Project, 17 February 1982."

MR. WADE: We will offer Exhibit 267, Your Honor.

MR. COOLEY: No objection.

THE COURT: Plaintiff's Exhibit No. 267 is received.

(Plaintiff's Exhibit 267 was admitted into evidence.)

BY MR. WADE: (Continuing)

Q. Mr. Armstrong, I would like you to read the first paragraph of Exhibit 267 to the jury.

A. "Project Information. Gerry Armstrong is a blown Sea Org member who had access to a lot of sensitive information. He has now disaffected, from what we can see. He is hiding out apparently. He knows the GO has been looking into him, so he has been layng low to avoid this. So we don't know where he is currently, and he is expecting us to approach him on a covert line. So this presents the trickiest of problems. It would undoubtedly antagonize him further if any of our investigation efforts became known to him, yet we still need to know what he is up to."

Q. Would you please read the project purpose, which is the next paragraph.

A. "Project purpose: To obtain a means of predicting Armstrong's activity in such a way there is no possibility of backflash."

Q. The next paragraph, I believe, gets into how to locate you. Would you skip that and please go to paragraph, which would be paragraph four, and read that to the jury.

A. This is: "Step 2. Go through his files and folders to extract the names of people who knew him and who are still well connected up and completely trustworthy. Interview these people to find out who Gerry's close friends were and to see if he had any relatives in this area. We could then followup to see if he might be staying with them."

Q. I would now like you to read Steps 6 through 12 of the exhibit.

A. "Step 6. Once he is located, determine where he is currently working. This may entail following him to see where he works.

"Step 7. Once it is established where he works, see what opportunities might exist there for setting up an inquiry line from an apparent wog angle. He might not be expecting that at all.

"Step 8. Review his files for people who had a good comm line with him and who are no longer on staff and who would be trustworthy.

"Step 9. Once the list of candidates has been selected from Step 8 above, do a complete check on these people, discretely, to see what their current status, demeanor, attitude, et cetera, are as regards their potential willingness to help us on this cycle.

"Step 10. Using standard and discrete recruitment tech, interview the trustworthy candidates to see if they can be used as a resource.

"Step 11. Arrange a suitable cover story and other standard procedures such as a plausible reason for the resource to be contacting G.A., et cetera. Initiate the comm line and proceed from there on that line."

Q. Would you read the last two steps, please.

A. "Step 15. Pursue the potential existing line that might be available to us via a trusted GAS who is a writer" -- A GAS is a Guardian Activity Scientologist for Bl that's a covert operative. That was a parenthetical statment. -- "and who's respected by Gerry. This would require some reach from Gerry, though, as he might be suspicious if this GAS made a big reach for him."

Q. That GAS they are talking about, would that be Dan Sherman?

A. Yes, it is.

Q. Please read the final Step 16.

A. "Step 16. If the product had not been achieved at this point, review the steps taken so far and debug or replan as needed."

Q. Now, this was written in February of 1982, about three months after you left?

A. Yes. Two months.

Q. Two months after you left. At that time had you been sued by the organization yet?

A. No.

Q. Had you sued them?

A. No.

Q. Do you have Exhibit 254 there, Mr. Armstrong?

A. Yes.

Q. You testified about your state of mind after these various projects or investigators harassed you for a period of time. And you also testified that your former -- I guess your ex-wife, Terri Gamboa, was she a CMO member?

A. She was a CMO member while we were on the ship and later she, now, or at the time in March of '84, was working for Author Services Incorporated.

Q. You testified you met with her in a park in March of 1984?

A. Yes.

Q. Can you identify Exhibit 254 for the jury, please.

A. This is a debrief by Terri of the project she was on to contact me and handle me or get information from me, which took place in March of 1984 just prior to my trial.

MR. WADE: Your Honor, we would offer Exhibit 254 at this time.

MR. COOLEY: I have no objection.

THE COURT: 254 will be received.

(Plaintiff's Exhibit 254 was admitted into evidence.)

BY MR. WADE: (Continuing)

Q. Mr. Armstrong, I would like you to read to the jury the entirety of Exhibit 254.

A. Dated 12 March 1984. "Debrief. Gerry Armstrong meeting, 8 March, '84. I met with Gerry Armstrong on Thursday, 8 March, '84, to see if I could do any kind of a handling on him to get him to knock off the war and back out of the suit or anything in this direction. I phoned him on Tuesday, the 6th, and told him that I would like to meet with him as a friend to see if I could help him in any way. He was agreeable to a meeting. I asked if he was going to bring his wife and he said he would see if she wanted to come and if she did then she would come, otherwise she wouldn't. He was in apathy, bordom.

"On Thursday, I met with him at ten in the morning up at the Griffith Park Observatory. I arrived twenty minutes late. They drove up behind me, but I found out they had waited twenty minutes and given up. They left, but saw me coming up the hill, so turned around and came back. So they definitely wanted the meeting. His wife did come, so I asked if she could wait for us, as I wanted to speak to him alone. They agreed to this.

"From the point that he had gotten out of the car, he looked very hostile with a very stern face. His eyes and face looked very insane. He came over to me and we walked away to talk and I just opened up with regular small talk. But the first thing he did was stick his notebook in my face and written on it was, 'You said you could help me, so how can you help me?' Anytime I tried to say something to him, he would just put the notebook in front of me without saying a word. In other words, he didn't want to give me any information or get into anything other than hear what I had to say and how I could help.

"I told him that I just wanted to see him uninvolved from all this. I didn't think he needed to keep carrying on this war and that he could end it just by getting out of the suit before it got worse for him and before he ended up owing even more money. He started to rant and rave to me about how Scientology and LRH had lost him fifteen years of his life, because it had done him in and jerked him around and screwed him over and so on and so on, ranting and raving insanely.

"He definitely wanted to get out of the suit, but he has a hundred to a $150,000 debt to his attorneys, which he absolutely must pay as they are his, quote, friends, unquote, and he, quote, owes them his life for saving him from all this, unquote. I pointed out that he stole the documents and started this whole thing, himself. All he had to do was give back the documents and he could end the whole thing. He disagreed, of course, that he had stolen the documents and said those documents are vital to prove that he's been screwed around and jerked around with for years. He wants his PC folders very much so that he can regain his sanity by quote, sorting out what Scientology did to him and unravel it, unquote. He kept hinting at wanting some sort of offer from the Church to help him pay off the attorneys, as he is not willing to step out of this and be left economically busted for the rest of his life, as he puts it.

"I pointed out that there is no way that the Church is going to pay any of his attorney bills, as he stole the documents and started the whole thing. The best he can do is get out before it gets worse. I told him about the recent win in the LA case, where the judge ruled that Scientology is a religion, et cetera, et cetera. He mentioned that he didn't know about this, but so what type of response.

"He would consistently rant and rave about how Scientology is screwing the world and it's worse than the government and this and that. He would flip into about a hundred different valencies all at once. He said that he still thinks I'm over the litigation and who am I going to go back and report to and did I get what I came for? And here I am just jerking him around like all the others. He saw Marty already and he got jerked around by Marty and now he's getting jerked around by me.

"I told him he was jerking me around, as I came as a friend to talk to him, and he wasn't even willing to talk. He just ranted and raved about things that I didn't even want to hear. And he might think and believe those things on Scientology and LRH and that's fine, but there is millions of other people who don't. And I don't and I didn't come here to listen to him carry on about this bullshit. At this point, he would knock it off as he could see that I was willing to end the meeting if he did continue. Then we would start having a somewhat sane discussion for a few minutes before the ranting and raving started up again. He compulsively had to rant and rave about Scientology and LRH.

"Then he started telling me about his little bird that he has at home on how it speaks a hundred words and it's the sanest part of his life. Then in the middle of this decent conversation, he blurts out, 'And don't you send one of your people around to kill him. He is constantly on the alert and looks out for snipers in the bush that we have planted to kill him.'

"While we were up at Griffith Park, he would constantly look around in the bushes and check everywhere in case I had set him up. Somebody burst a balloon up there and he almost had a heart attack thinking someone had fired a shot at him. He said that Scientology has operations out on him trying to kill him and someone, one of us, tried to run him off the freeway and so on. Then he said he would rather be dead than fighting this way and maybe we would do him the favor of killing him, because then it would be all over and he wouldn't have to worry about it my more and he would be dead. He said how he can't have any friends because he's afraid of getting close to anybody in case they are a spy for Scientology or whatever. He brought up the SP declare and how were things that were stated in it and how they were not true and they are very out of hand. He again mentioned his PC folder and asked me if I could pass on a message that he wanted his PC folders back.

"He then asked me to take a message back, 'Here I'll give you something to take back to them. If I delivered all the documents to the Church, would they agree that they could never be made public under any circumstances or barring that, under what circumstances would they be made public?' He said, 'Ask them that. I'd like to know that.'

"I then asked him why he wanted to know the above, as the way he said it was very different from the way he had just been caring on. It was like change in his insane ravings and it didn't fit in with his other statements. So I asked him why did he want to know this? He didn't answer me for awhile. He was sort of daydreaming. And then finally he said he didn't know and didn't care and he didn't really want the answer to the question anyway. He just threw it out there and it wasn't really him asking the question anyway. He didn't ask the wuestion; he didn't want to know. It was just during one of his moments of his insanity.

"He said that this whole case and the procedure is driving him insane. I told him I was sorry I couldn't be of more help. But if in the future there was someway I could help him, he could give me a call. He had my phone number already, so I left the line open for the future. I recommended to him he take a vacation to get away from it all and just let himself destimulate. He said he can't because he's got a trial coming up on the 22nd of March.

"We started walking back towards the cars and as I walked toward my car, he said, 'Where are you going?' I said, 'I'm going to my car.' He said, 'Well,' -- obviously stalling and wanting to continue the conversation, but not really knowing what to say. He then said, 'Well, don't you want to talk to Joycelyn?' His wife. I said, 'If you want me to, I will.' He said, 'Well, I think she might want to talk to you or think it would be good if you talked to her.' We went over to where his wife was standing.

"As soon as he got there, he switched again to a totally different valence and in a very one/one type comment he said, 'So, did you get what you came for here? Are you satisfied? Did you get the data you wanted?' She caught on that something was strange and said, 'Are you finished talking or do you want me to leave while you continue your discussions?' He said, 'No, that's fine. We are done.' Then he said to me again, 'Well, did you feel you accomplished much?' And I said, 'Well, I have to -- I'd have to ask you because I came here to help you. So if you don't feel I was any help, then obviously not.' That shut him up and he stopped attacking me.

"He asked his wife if she wanted to speak to me and she said, 'I have nothing to say.' So I didn't speak with her. I just gave her a friendly smile and indicated we could talk if she wanted to. She didn't.

We walked towards the cards and he asked me if my last name was still Gamboa and I said it was. Then we bid each other good bye and drove away."

Q. The next part is a summary and that's capitalized and centered in the middle of the page?

A. Yes.

Q. Would you read that for the jury, please.

A. "SUMMARY. To sum it up, he was pretty nutso and very hard to communicate with, as he would be in the middle of a ranting and raving insanity and I would find that I would have to constantly try and communicate through this. I would get him to knock it off for a second so that I could actually communicate to him, and this would actually work. But then within the next couple of minutes, he would be back into it again, so it wouldn't last long. I did at least establish a comm line with him and I think it is something that I can build on in the future if we want to. He is willing to meet with me and talk with me. However, he trusts no one. He lives in a world of total fear and paranoia of everything and everybody.

"It is obvious to me and clear by his statements and actions that he definitely wants out of this suit and he definitely wants help, but he needs the money to pay off his attorneys and that's what he is after. He's hoping the Church well give him an offer. He has no other way out, in his eyes, and no way does he want to drop out of this with a debt that will last him the rest of his life. He is very desparate for a way out and I feel he would be willing to talk to anybody who might have anything to suggest. Only because he would be helping they are going to offer him something that will actually help.

"An important point for him was getting his PC folders back as he feels that's the solution to his future sanity. And he brought this up several times. A line has been established with him and possibly this can be built up from here and used again in the future. He is desperate and he has no way out at this point. Terri Gamboa."

Q. Mr. Armstrong, two or three times in this letter, and various other discussions, I have heard representatives of the organization say that you stole the documents. In the case that was tried, I think beginning in March of 1984 --

MR. COOLEY: I object.

THE COURT: State your objection.

MR. COOLEY: It's irrelevant, Your Honor. He's now had him read something which he is now going to rebut. If he didn't want to have him put it in -- he's creating a straw dog to shoot down. Your Honor excluded the same kind of testimony yesterday.

THE COURT: I excluded the court decision yesterday.

MR. COOLEY: That's what he's getting to now.

THE COURT: I don't know whether he is or not with this line of questioning. I know that on cross you asked him whether he stole documents or not. That was brought up. I'm going to let you pursue that, but I don't want to get into the decision rendered in any other court.

BY MR. WADE: (Continuing)

Q. Was that an issue in the case, the Armstrong case?

A. Yes.

MR. WADE: I take it I'm not allowed to ask the next question?

THE COURT: I don't know what it is. But I can guess what it is.

BY MR. WADE: (Continuing)

Q. What was the decision --

MR. COOLEY: Object.

THE COURT: Sustained.

BY MR. WADE: (Continuing)

Q. Did you know that an important point for you was getting your PC folders back?

A. Yes.

Q. Was the next call you got during this project the call from Joey about your PC folder?

A. The next contact was from my friend, Dan Sherman. The first contact with the people who called themselves the Loyalists was offering the help regarding giving me the information about what was going to happen in London and the PC folder matter. They said that my PC folders were being moved and that I could get them. And I declined. This is just before I went to London after the Armstrong trial.

Q. Was your wanting to see your PC folders, was that what they would call in Scientology a button?

A. Absolutely.

Q. What about your desire to help? You mentioned in the tapes your desire to help. Is that a button?

A. Absolutely.

MR. WADE: I have no further questions, Your Honor.

MR. WADE: Your Honor, at this time we would once again offer Exhibit 252, which is the decision in the Armstrong case. It was discussed on the tapes and we think it is relevant as to discussion on the tapes and the questions asked.

THE COURT: I'll take that matter up at the first recess.

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MR. COOLEY: Would you hand the witness Exhibits 262 and 263, please.

(Documents were handed to witness.)

RECROSS-EXAMINATION

BY MR. COOLEY:

Q. At the outset of your redirect examination, these exhibits were put in by counsel. Exhibit 262 is your assignment to the RPF. You said that had something to do with a dispute you had with a Nikki?

A. Yes.

Q. What is Nikki's last name?

A. Merwin.

Q. Nikki Merwin?

A. What was her position at that time?

A. She was the Controller/Communicator. She was Mary Sue Hubbard's communicator/secretary type.

Q. It wasn't just a question of talking back to Nikki that got you sent back to the RPF was it, Mr. Armstrong?

A. No. I swore at her.

Q. And you had a very vitriolic exchange with her, did you not, sir?

A. Yes.

Q. Now, were you assigned to the RPF all by yourself?

A. The document reads Terri and Gerry Armstrong. We were both assigned. Many other people followed us.

Q. Terri Armstrong, at that time, is the Terri Gamboa that you have just been talking about in the Exhibit 254 that you read to the jury; isn't that correct?

A. Yes.

Q. She was your wife at one time?

A. Yes.

Q. And on this Exhibit 262, she got assigned to the RPF with you, did she not?

A. Yes.

Q. It said that RPF assignment was to be effective on your return. Where were you at the time?

A. At that time, I was locked up. I was under guard in Fiefield Manor in the Intelligence Bureau of the United States Guardian's Office in Los Angeles.

Q. And where was Terri Armstrong, who became Terri Gamboa?

A. Terri was likewise.

Q. Now, you see the reference to LRH Personal Communicator for the Board of Directors?

A. Yes.

Q. Who was that?

A. Ken Urkhart.

Q. What role does that document indicate he played in this assignment?

A. Ken Urkhart received an order, a telex order from L.

Ron Hubbard.

Q. Do you have that?

A. No. I saw it.

Q. Uh-huh.

A. And as it says here, "By order of the Commodore", we were assigned. And the Commodore was L. Ron Hubbard. And upon my -- our arrival back in Clearwater, 1st of July 1976, we went and saw Ken Urkhart, and he then had a telex from Hubbard ordering us, Terri and myself, to the RPF.

Q. Where does it say per order of the Commodore, sir?

A. Right at the beginning of the RPF assignment.

Q. Would you just read that portion.

A. "By order of the Commodore, Gerry Armstrong and Terri Armstrong are assigned to the RPF effective on return."

Q. Whose responsibility initials appear on that document? Do you see down on the lower left-hand corner the typing and responsibility initials? Would you tell us who that is.

A. Typing, LDV, I believe is Lynn something Visk; KU is Ken Urkhart; BD is the stamp for the Board of Directors.

Q. Now, with respect to Exhibit 263 -- Do you have that in front of you?

A. Yes.

Q. -- that's where you got assigned additional RPF duty for one month, this one being dated August 17, 1976; correct?

A. Yes.

Q. You never wound up doing that month because you did something outstanding and it was rescinded; correct?

A. Yes.

Q. Was Terri Gamboa also assigned an additional one month in the RPF?

A. Yes.

Q. Whose signature appears on that document?

A. Barbara Price.

Q. Who is she?

A. Her post title here is the LRH Communicator for Estates, L. Ron Hubbard's communicator in the estates area.

Q. And whose responsibility initials appear on that document?

A. I don't know who the typist is. LF may be Lee Farrell; Barbara Price; MV is Margie Veneer, VD.

Q. Now, was your wife, Terri, in the RPF with you on that occasion all during the time you were in?

A. Not during the whole time, but she was until she got out.

Q. How much time did she serve in the RPF?

A. My guess is eight or nine months.

Q. She went in when you did on what date, sir?

A. 1st of July, 1976.

Q. She was a member of the CMO at that time, was she not, the Commodore's Messenger Organization?

A. Yes.

Q. And how long had she been a CMO?

MR. WADE: Objection, Your Honor; irrelevant.

THE COURT: Well, I think he can pursue this line of questioning and see where it goes.

THE WITNESS: I would say, at that time, eight years.

BY MR. COOLEY: (Continuing)

Q. You were never a member of the CMO, were you, sir?

A. No. I worked in the CMO for a brief time. It was -- I was told that I was going to be in the CMO. This was after getting out of the RPF at the end of 1977. And I worked in the CMO first in Clearwater, where I did some proofreading on Hubbard's screen play "Revolt in the Stars" and then I worked in the CMO in Los Angeles, in the middle of December. There, I was never officially posted to the CMO.

Q. When were you and Terri married?

MR. WADE: Objection; beyond the scope of recross-examination.

THE COURT: I don't understand --

MR. COOLEY: They were husband and wife when they went into the RPF. I wanted to establish how long they had been married at that time, Your Honor.

THE COURT: There's an objection. I fail to see the relevance of it.

MR. COOLEY: Well, I don't think it's beyond the scope of the redirect, the concept that his wife --

THE COURT: I do. I'll sustain the objection.

MR. COOLEY: Okay.

THE COURT: Suffice it to say they were married at the time.

BY MR. COOLEY: (Continuing)

Q. When were you divorced, sir?

A. 1979.

Q. Was Terri Gamboa a member of the Watchdog Committee?

A. She may have been. She was a member of an even more powerful body than the Watchdog Committee, what became known as the Special Unit, Special Project, Mission All Clear. So she was at least on a par, if not above, the Watchdog Committee in 1981-82.

Q. You mentioned on your redirect examination that the Safe Environment Fund was to raise money for the defense of the top echelon GO members, including Mary Sue Hubbard, who had been indicted. These GO people at the top echelon were still in control of the GO right up until of July of 1981, were they not?

A. Underneath L. Ron Hubbard, yes.

Q. And it was David Miscavage and members of the CMO that overthrew that group, was it not?

A. Well, they removed them, certainly. After that point, the power in Scientology was solidified under one group. Up to that point there had been two -- two command lines: Hubbard controlled through the Sea Org; Hubbard controlled through the Guardian's Office. After he got rid of the Guardian's Office, then the CMO took over control of all things. Nothing really changed. The operation remained exactly the same, but the name changed and the leaders were replaced with other leaders.

Q. You left the organization in December of 1981, did you not?

A. Yes.

Q. And at that time, who were the people that were managing the organization that you were able to say?

MR. WADE: Objection; beyond the scope of recross, Your Honor.

THE COURT: I think so.

MR. COOLEY: I won't argue the point, Your Honor. I don't think it is.

BY MR. COOLEY: (Continuing)

Q. You were anxious to obtain, in 1984, charts of who controlled what, were you not, sir?

A. Yes.

Q. You were anxious to obtain who management was, were you not?

A. Yes.

Q. And because you had been off the lines for quite a long time, hadn't you?

A. Yeah.

Q. And you didn't know who was running the organization at that time, did you?

A. Well, as I have answered this question before --

Q. I'm talking about 1984, now.

A. I have answered it in regards to 1984. -- it is pretty well known --

Q. No, sir. I'm interested in what you knew in 1984.

A. I'm telling you what I knew in 1984. I knew that Hubbard controlled via ASI, via RTC, that is the group -- corporation which he established to ostensibly hold the trademarks of the organization, through the Broekers, Pat and Annie Broeker lived with him. The conduit to them was David Miscavage. Who the various Board members were, I didn't know. The organization no longer put names on its various issues, so even the person who brought out the various documents on me, no post titles. There were post titles, but there were no personalities.

So there was a lot of details which I sought to know, because it was very difficult to get any information out of the organization. Generally they work on what they call a need-to-know basis. They compartmentalized. They hide the actual control so that those people who you are able to get to testify simply don't know anything. And I wanted to know who the various people were, personalities.

Q. So you didn't know that?

A. No. I'll say again, I knew the general line. I know the people at the very top of the organization. Who the various buffers are below that, I don't know.

Q. Is that why you needed an organization chart and a statement of who were on the Board of Directors and the lines of authority and who authorized what?

A. Well, this group of people came to me and asked for my help in this thing. And they were expecting my supposed knowledge or wisdom or help or whatever, without my knowing anything that they knew. That's quite obvious what exactly the plan was in retrospect, but I felt that I can be of most help to these people if we figure out how this thing operates. What are the agreements? Who are the people? Who are the Board members? So, yeah, I wanted to know that stuff.

Q. Because you didn't know it at that time?

A. That's correct. I reiterate, I know how the organization operates. I know that ASI controls. I know that money is funneled to Hubbard in that way. I know who the various personalities, at least some of them, are in ASI. But people move around a lot in the organization, people get busted, and one person is replaced with another person on an almost daily basis. And I sought to stay up-to-date on it.

Q. How far be behind were you?

A. Well, information kept coming out in the various cases. The organization was finally forced in one jurisdiction or another to admit to --

Q. I asked you how far behind you were, sir. That's all I'm asking.

A. I'm answering that.

MR. COOLEY: I object to this answer, Your Honor. I ask him to be instructed to give a responsive answer in terms of time.

THE COURT: Well, I'm afraid he's doing that because he's attempting to tell you how far behind he was and how he got the information.

MR. COOLEY: I didn't ask him how he got the information, I asked him --

THE COURT: But in order to determine how far behind he was, he is going to have to answer the question.

MR. COOLEY: I object to it, Your Honor.

THE COURT: You asked it.

Go ahead.

MR. COOLEY: I did not ask that question.

BY MR. COOLEY: (Continuing)

Q. Go ahead. Do you want to tell us how you got the information from all the other lawlsuits that you were giving affidavits in?

MR. WADE: Objection, Your Honor.

THE COURT: Sustained.

The jury will disregard that.

Now, if we have to get the question over again, we can do that. Do you remember the question, Mr. Armstrong?

THE WITNESS: Yes, Your Honor.

THE COURT: How far behind were you?

THE WITNESS: Right. Your Honor, to me, I don't know where Mr. Cooley is going with it, but it's sort of a nonsensical question.

BY MR. COOLEY: (Continuing)

Q. I'm a nonsensical guy. I'd like an answer though.

MR. WADE: Objectoin, and move to strike the comment of Mr. Cooley.

THE COURT: I think that one ought to stay in.

Go ahead.

THE WITNESS: Obviously I was being given information by the so-called Loyalists. They claimed it was up-to-the-minute information. I was being purposely given false information. They were not a particularly reliable, as it turned out, source of information. They would say it's up-to-the-minute, but they were giving me bogus information. Some information was up-to-the-minute as I got it. Some of it was old. You know, I was in a sense sort of a clearing house of this stuff. A lot of people called me. Homer Schomer testified in my case. I knew through Homer Schomer the structure of ASI and the communications going to Hubbard to ASI. He brought us up to the end of 1982. Some other little girl that got out of organization brought us up into 1984. The organization's own documents -- you know, gave us a certain amount of information about what's going on. Obviously a lot of it's hidden. I can't tell you any particular part of the organization, how up-to-date it was. You know, L. Ron Hubbard could have been dead in 1983, maybe that's the current information. I have no way of knowing that.

BY MR. COOLEY: (Continuing)

Q. Is that it?

A. Yes.

Q. Now, on this L. Ron Hubbard's Personal Auditors Bulletin, which has been marked as Exhibit 265, it was originally copyrighted when, sir?

A. Originally published in 1956.

Q. I'm looking at page two. Copyright 1953, 1954, 1973; do you see that, the second page?

A. Yes. I would have to check the actual dates. This one here appears to be 1956, so --

Q. Do we have the same exhibit?

A. The copyrights -- just so you understand, the organization puts together a pack of these things and the particular bulletins in there would be covered by the spread of the copyright dates. So my guess is, that the actual -- the first printing date would be on the document, itself, and that's May 1, 1956. And that was obviously recopyrighted and the last printing of this was 1975.

Q. Do you see the front cover, March -- it's PAB, these Professional Auditors Bulletins, 75-79; right?

A. Yes.

Q. March 1956 to November 1956?

A. Yes.

Q. And then on page two, the copyright is originally 1953, 1954, and again in 1973; do you see that?

A. Yes.

Q. And the document to which you refer, which was PAB number 82 was originally released on May 1, 1956; is that correct?

A. Yes.

Q. All right. And in this green book, you have two of them up there, or had two. Volume six. One of the volumes you have was -- appeared to be printed in 1974, first U.S. printing in 1974; then you had -- you had another one that was 1982, did you?

A. Yes.

Q. Another book. So what printing was that?

A. 1982.

Q. Did it say first printing, second printing; what printing?

A. I don't have it with me, but it did give a number of printings and the last one was 1982.

Q. Okay. And that one has a number of copyrights running all the way back to 1954; right?

THE COURT: Do you want to see the book?

THE WITNESS: I'll accept his word on that, Your Honor.

MR. COOLEY: Perhaps Mr. Wade gave it to him before, could give it to him.

THE COURT: If he wants to see it certainly, there is no problem.

BY MR. COOLEY: (Continuing)

Q. You had noted that on the cover page, hadn't you?

A. Yes.

Q. And on page 196, which is the page from which you were reading, the bulletin that was being read from was an information letter of April 14, 1961, was it not?

A. Yes.

Q. These green books are the Organization Executive course books that contain in a chronological fashion all of the -- these kinds of letters and bulletins from LRH; isn't that right?

A. Yes.

Q. And they set them forth in chronological order, do they, within subject matter?

A. Yes.

Q. With respect to Terri Gamboa's report of your meeting on the 8th of March, 1984, did you hold up a pad to her and say, "How can you help me?"

A. I didn't do it as she said, but I did have a pad. I had written down -- she had called me two nights previously late at night and she'd made this statement, "I want to help you." And I had written it down at the time. And her demeanor belied that, and I did hold it up to her.

Q. When you held the pad up to her and said, "How can you help me?" was that before you had spoken any words?

A. Well, I think that we had greeted each other and walked away from where my wife, Joycelyn, was standing. We had talked, but we had not gotten into whatever it was she had

-- in whatever way she said that she wanted to help me.

Q. Did you hold it up written to her because you thought she might be wired and you didn't want to do any talking?

A. I don't -- I mean I was concerned that she might be wired, but I did -- did talk to her. I talked to her the way I talked on those other -- on the videos, to some degree, but -- I don't know. I just -- I wanted her to say what it was. How could she help me? She never did.

Q. Did you do anything to satisfy yourself that she wasn't wired?

A. No. Was she?

Q. Did she tell you, in substance, that she couldn't help you as long as -- as long as you were talking the way you were because she couldn't communicate with you?

A. No. I kept asking her -- she kept saying, "Well, I'm here to help you." And I would say, "How? Tell me something." Then she would want to know, "Well, I need to know -- I need to know the data from you." How does this -- "You know, you said you wanted to meet with me to help me. How? What do you expect? What are you going to do?" She said many times, "Better get out before it gets worse. It's going to get worse." And I laid out the whole litany of what had happened to me. Her answer was, "It's going to get worse."

Q. Did you tell her not to have one of her people to come around and kill your bird?

A. Something like that.

Q. How long did that meeting take, sir?

A. I'd say an hour.

Q. When you suggested that she -- did you suggest that she talk to your wife, Joycelyn?

A. You know, we walked -- the thing was over. I was incredibly frustrated. I felt like she had jerked me around one more time. I -- I had bought the line of these people and -- and it was over and we were walking back and I asked her is she wanted to talk to Joycelyn.

Q. Did you, in fact, ask her --

A. It wasn't any big deal.

Q. I'm sorry.

A. Go ahead.

Q. Did you, in fact, ask her the question about documents that she referred to in there? Just yes or no.

A. You would have to refer me to what part you are talking about.

Q. "Here, I'll give you something to take back" -- She told you she was followed. I just want to know if it's accurate. "I'll give you something to take back to them. If I deliver all the documents to the Church, would they agree they could never be made public under any circumstances, or barring that, under what circumstances would they be made public? Ask them that. I would like to know that."

Did you ask that question?

A. Something like that.

Q. All right. Did you talk about owing your lawyers a hundred and fifty thousand?

A. What I said was -- She said get out of the lawsuit. I said, "I can't." The organization had already made this wonderful offer to me. In the meeting with Marty I had said that you can have me for free. But don't -- you know, after you have sued me and you have harassed me and you have destroyed my life, don't now stick me and have me screw my attorneys. I just can't do that. So I told her basically the same thing. I mean, you can't -- So she said, "How much?" I said, "At a guess, because I never received a bill from these people," I said, "it will probably be a hundred, hundred fifty thousand dollars. That's how I would feel if, now, I walked away from these people." You know, if I told my attorneys to take a hike and I was bowing out of this thing. I mean, they saved my life. They have been defending me for two years and I just couldn't do it. But I didn't want anything for.

Q. To which attorneys were you referring? Michael Flynn?

A. Yes.

Q. And his local counsel down in Los Angeles?

A. The firm of Contos and Bunch. Julie Dragojevic, Bruce Bunch.

Q. You recall that you learned last week, I guess, that Dan Sherman had passed on information to the Church, as you put it, part of the so-called operation; correct?

A. Well, I don't know. I mean, you have there a letter from Dan Sherman. You call it a pack of materials. It's dated 10 March, this year. There is a letter I wrote him from up here. You know, either you went through his place or he gave it to you or you got it from somewhere, and I don't know. I mean Dan told me, I called him up when this whole thing blew up and I asked him and, you know, it was a pretty tense time. And he said he was -- he was afraid. And what he did out of that fear, I don't know. Whether or not he was in bed with them the whole time, I don't know. This document here indicates that they had used him, at least since February 1982. They have used our friendship. I went to London at his request and did some research for him for a book that he was doing. I mean, that's -- I don't know, if he was working for them or if only now out of fear he's forced into a position. Sooner or later, we will be able to determine that. As yet, I can't tell you. You do have his letter.

Q. Have you since I presented you with some documents that you knew had to come from -- had been sent by you to Mr. Sherman, do you remember me showing you those documents?

A. Dan was the person who contacted Joey. Dan was the first one to tell me about the Loyalists. He was the first one to tell me about the fact that there was this group of people sought to reform the organization and get rid of the tyranny on top. So the materials -- you know, the various things we passed back and forth, a lot of them went to Dan and then from Dan, I guess to Joey or -- or into the organization.

Q. My question simply is this, since last week, have you been repeatedly calling Dan Sherman and hanging up when the phone was answered?

A. Mr. Cooley asked about that the last time. Whenever that was. It was a week ago or something. I had called Dan twice at that time. And both times, he wasn't there. I never left a messge on the machine. I hung up. That's the last time I ever called Dan. I think it was a Tuesday, because Dan said he was going to call me on a Monday. He didn't call. I called those two times. I told Mr. Cooley about the two times. I have not subsequently called at all.

Q. You have not called him over the weekend or early this week?

A. No, I have not called him since.

Q. With respect to these books that you said you read, that were talked about in the big HAT; is that what it's called?

A. Art of War, Spy and His Master.

Q. Yes, you read all those books.

A. I think there was one or two of them missing from the Port Captain's Office, but I did read a number of them.

Q. Which ones did you read?

A. Art of War. I think its --

Q. Spy and His Master?

A. I think that's the titles. The Hungarian Campaign. There is another one; I forget what the title is right now.

Q. What else did you read?

A. Those are the ones that I recall.

Q. Just those two?

A. I don't have the list here. There is another one. Total Espionage. I think, Curt Rise. I think that's who wrote that one. Total Espionage.

Q. Then you were told to look up and understand the meaning of the terms communism and socialism and facism and FBI and CIA, M5, M6; that's British Intelligence, isn't it?

A. MI5 and MI6.

Q. KGB, that's Russian Intelligence?

A. Yeah.

Q. And just generally become familiar with all of the kinds of intelligence that there were out there in the world; isn't that a fair statement?

A. Those are the various -- those are the significant branches. And the broad aspects of intelligence?

Q. Did you look up those terms and familiarize yourself with them?

A. Yes.

Q. Thereafter, you applied to enter intelligence in the GO office in B1, didn't you?

MR. WADE: Objection, Your Honor. We went through this in the cross-examination before.

THE COURT: I thought we did go through that on cross, Mr. Cooley.

MR. COOLEY: I thought it was kind of reopened on redirect with that big HAT he put in there.

THE COURT: Those are references of books that he had read.

MR. COOLEY: Yes, these terms that I have referred to.

BY MR. COOLEY: (Continuing)

Q. Did you, in the course of your studies and examinations of the documents, did you ever see a memorandum that was handwritten, was ordered to be put in your personnel file saying that you were not to be connected with the GO or with the CMO or in any trusted position?

MR. WADE: Objection. Irrelevant, Your Honor.

THE COURT: I think he can answer the question.

If you know, you can answer it.

THE WITNESS: I did see such a document. In fact, I think the organization produced it in this most recent batch of materials they gave us maybe a week ago. I think it's amongst that bunch. And I believe it's signed Ann, and that would be Ann Broeker. It would have been from the -- it would have originated from Hubbard. And --

BY MR. COOLEY: (Continuing)

Q. What was the date of it, do you remember that?

A. My guess is it would have been probably latter part of 1977. I really can't say for sure if it was '76 or '77, but my guess is that it would have followed my arrival at Gilman Hot Springs. It may be before that. It probably is before that, so it's '76-'77 period.

Q. That memorandum was ordered placed in your personnel file; was it not?

A. Well, I had heard about it before. I hadn't seen it. That's really what I know about it. I have -- you know, I heard about the -- about the situation when I arrived at Gilman Hot Springs. I probably was not very acceptable to some of the CMO hierarchy and I probably wasn't acceptable to the GO hierarchy.

Q. Do you think that originated with L. Ron Hubbard, LRH, since you said that Ann had to be Ann Broeker?

A. Yeah. She was a messenger at the time. I'm not sure if she was the CO, commanding officer of the CMO, Commodore's Messenger, but she definitely was a mesenger and was therefore acting for Hubbard.

Q. And that memorandum existed at the time Laurel Sullivan advocated you for the position of researcher on the biography; is that right?

MR. WADE: Objection, Your Honor. Irrelevant. We are going so far afield. It's beyond the scope of recross-examination.

THE COURT: That is, Mr. Cooley.

MR. COOLEY: I will just ask one other question, if I may, Your Honor.

THE COURT: Sure.

MR. COOLEY: Let me have this one and I'll quit.

BY MR. COOLEY: (Continuing)

Q. Can you tell us, sir, how it is that a memorandum that says you are not to be allowed in a trusted position is overcome so you can become the personal researcher on the biograhy of L. Ron Hubbard?

A. Well, the way it's overcome is that Mr. Hubbard is extremely opportunistic and there is no such thing as stability in the organization. And an order today is not an order tomorrow. Someone is given a status of kacon, which in the organization means that he is forgiven nine lives, he's forgiven nine offenses. The very next day, he can be destroyed. It's all meaningless. The same is true in the other direction. Today a person is assigned to the RPF. The next day, he's pulled out at the whim of Hubbard. And that happens to be how the organization is constructed and that's the only -- The only thing that can explain how this thing happened. In actual fact, no one would perceive that as a violation of the rule anyway. I was not -- I was neither in the Guardian's Office nor technically in the messenger organization. So it was not, in fact, a violation of the order.

Q. The order also referred to any position of trust and confidence, did it not?

A. I don't have it here before me, but -- I mean, I had already been in charge of Hubbard's Household Unit at Gilman Hot Springs throughout 1979.

Q. In charge of the renovation, had you not?

A. Well, I was in charge of the various household staff at Gilman Hot Springs. Once Lola Resseau went over to Hemet to the location we called X, then I was what's called the Deputy Commanding Officer of the Household Unit at Gilman Hot Springs. And underneath Kima Douglas. So I suppose that could be construed as a position of responsibility. The same is true of the biography project.

Q. Yes, sir. That's the point, isn't it? As I understand your testimony, LRH was capable of issuing an order that you not be put into a position of trust one day and putting his life in your hands tommorow; is that your testimony?

A. I don't know that he put his life in my hands. It seems like in retrospect, he never trusted anyone. He never trusted anyone enough to be honest with us and he never trusted anyone enough to really give them the responsibility to do the particular job that they had. He continually lied to us, ripped us off. So as far as giving us any trust, he never did. He never trusted us enough to even tell us the truth.

Q. He let you collect his biographical material, didn't he?

A. I don't know if he did that because he dropped out of sight. He wrote at the beginning that he thought everything had been stolen in 1953. Maybe he didn't know of its existence.

Q. What's your testimony, sir, did he authorize your petition and tell you to do it saying it was a wonderful idea or didn't he?

A. Yes, he did.

Q. And you are saying that he didn't know what you were collecting, is that it?

A. I really can't say. You are asking me why did L. Ron

Hubbard have me collect up all these things. Perhaps his memory is just shot. There is ample evidence of that. Perhaps -- you know, perhaps there is a cosmic comedian somewhere.

Q. He wrote Battle Field Earth after that, didn't he?

A. 1980, '81.

MR. WADE: Objection, irrelevant, Your Honor.

THE COURT: I think we are straining a bit now, Mr. Cooley.

MR. COOLEY: I have no further questions of this witness.

THE COURT: All right. Mr. Armstrong, you may step down.

THE WITNESS: Thank you, Your Honor.

(Witness was excused.)

THE COURT: We will take our afternoon recess at this time. I will take up the other matters that Counsel wanted discussed.

Please remember my cautionary instructions.

(Jury was excused. Following proceedings held out of the presence of the jury.)

THE COURT: Okay. We are going to take up the matter of -- I have a couple of messages in there that I have to take care of, then I want to take care of this exhibit number that you were concerned about.

MR. McMURRY: We were interested in a whole bunch of documents that we want to make copies of, Your Honor. We haven't had an opportunity.

THE COURT: I thought we were going to do that some morning?

MR. COOLEY: That's right.

THE COURT: If you want to take the afternoon, I can take the afternoon.

MR. McMURRY: That's fine. We will go on with another witness. We may want to recall Mr. Armstrong on one or two, because we can't seem to get -- we just wanted them produced. You let us have them. They are not privileged and we have marked them and Mr. --

THE COURT: He says he has a privilege matter attached to it.

MR. COOLEY: I'll show you the things, Your Honor, that Your Honor I'm sure was not aware of some of the things in there.

THE COURT: Okay.

(Court recessed at 3:15 p.m.)

Q.